

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO HOLDINGS
INC.

Respondents

MOTION RECORD OF THE RECEIVER

Returnable January 15, 2023

December 22, 2023

HARRISON PENZA LLP

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Solicitors for the Receiver,
Deloitte Restructuring Inc.

TO SERVICE LIST

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

B E T W E E N :

THE TORONTO-DOMINION BANK

Applicant

and

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO HOLDINGS
INC.**

Respondents

SERVICE LIST

As of December 21, 2023	
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Tab 1

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

**NOTICE OF MOTION
(Returnable January 15, 2024)**

Deloitte Restructuring Inc. ("**Deloitte**") in its capacity as Court-appointed receiver (the "**Receiver**") appointed pursuant to the Order of the Honourable Justice Steele dated May 26, 2023 (the "**Appointment Order**") of the Property, as defined in the Appointment Order, will make a Motion to a Judge as soon as the Motion can be heard.

PROPOSED METHOD OF HEARING: The Motion is to be heard:

- In writing under subrule 37.12.1 (1) because it is on consent;
- In writing as an opposed motion under subrule 37.12.1 (4);
- In person;
- By telephone conference;
- By video conference.

at the following location:

At the Court House, 330 University Avenue, Toronto, Ontario on January 15, 2024, at 10:30 A.M., or as soon after that time as the Motion can be heard by judicial teleconference via Zoom at Toronto, Ontario, with video conference details to be provided prior to this date.

THE MOTION IS FOR:

1. An Order, substantially in the form attached hereto at Schedule “A”, *inter alia*:
 - a. That the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today, and hereby dispensing with further service and confirmation hereof;
 - b. Approving the Receiver’s Second Report to the Court dated December 21, 2023 (the “**Second Report**”) and the activities and conduct of the Receiver as detailed therein, including the completion of the Receivables and Inventory purchase Agreement (as defined in the Second Report), and noting that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approval of the Second Report ;
 - c. Approving the Fees and the Fee Accrual (each as defined and detailed in the Second Report), and authorizing payment of same;
 - d. Approving the maintenance of the Holdbacks (as detailed and defined in the Second Report) by the Receiver, for the purposes detailed in the Second Report;
 - e. Approving the Statement of Receipts and Disbursements as detailed in the Second Report;
 - f. Authorizing the Receiver to make the following distributions (as detailed and defined in the Second Report):
 - i. The BMO Distribution;
 - ii. The Interim TD Distribution; and,

iii. The Final Distribution.

g. Discharging Deloitte as the Receiver on the filing of the Certificate of Completion as provided for in the Second Report, and releasing the Receiver from liability for its actions while acting in such capacity, save and except for the Receiver's gross negligence or willful misconduct; and,

2. Such further and other relief as counsel may request and this honourable court may permit.

THE GROUNDS FOR THE MOTION ARE:

The Debtor and the Appointment of the Receiver

1. Pursuant to the Appointment Order, Deloitte was appointed as the Receiver, without security, of all the assets, undertakings and properties acquired for, or used in relation to a business (the "**Property**") carried on by the Respondents, Injection Technologies Inc. ("**ITI**"), Moldco Plastics Inc. ("**MPI**"), and Moldco Holdings Inc. (collectively, the "**Debtors**").
2. The Applicant creditor, The Toronto-Dominion Bank (hereinafter "**TD**") is a secured creditor of the Debtors. The Debtors were indebted to TD in the approximate sum of \$15.6 million as at December 21, 2023, with interest and legal costs continuing to accrue (the "**Indebtedness**"), pursuant to certain financing provided by TD to the Debtors.

Actions of the Receiver since the First Report

3. The Receiver has previously issued a report dated August 15, 2023 (the "**First Report**") setting forth its actions to that date, which were approved by this Court in

August 25, 2023, and which included an Approval and Vesting Order issued in relation to two transactions entered into by the Receiver, the AarKel Transaction, and the Auction Transaction, each as defined in the Second Report.

4. The Receiver has since completed the AarKel Transaction and the Auction Transaction and has filed Receiver's Certificates with the Court in relation to same.
5. The Receiver has undertaken a number of other actions in furtherance of its mandate under the Appointment Order, as described in the Second Report. These actions include:
 - a. Winding up of operations at the Kitcher Property;
 - b. Preparation and filing of HST returns with the Canada Revenue Agency ("CRA") and making remittances in relation to same;
 - c. Collections from former customers of the Debtors for the benefit of the estate; and,
 - d. Assignment of ITI and MPI into bankruptcy, as at October 11, 2023, in order to allow for the orderly and efficient wind-down of ITI and MPI while allowing for the alignment of priority claims and crystallizing of various creditor claims.
6. With regard to collections, which have mainly come from collections of outstanding accounts receivable from former customers of the Debtors and from collection of amounts from post-receivership sales, the Receiver has collections of approximately CAD\$10.546 million as at November 30, 2023.

7. The Receiver has collected an additional \$746,621.00 and \$2,000,000.00 from the closing of the AarKel Transaction and the Auction Transaction, respectively.
8. The Receiver seeks approval of its actions as set out in the Second Report.

Approval of Fees and Fee Accrual

9. The Appointment Order requires the Receiver and its legal counsel to pass its accounts from time to time.
10. The Receiver and its counsel have each properly incurred fees and disbursements ("**Fees**") as detailed in the Second Report.
11. The Fees incurred by the Receiver for services provided by each of its legal counsel, Harrison Pensa LLP and Aird & Berlis LLP, are detailed in the Second Report.
12. The Receiver is also seeking to hold back a Fee Accrual (as defined and described in the Second Report) not exceeding the sum of \$250,000.00 (inclusive of HST) to cover the additional fees and disbursements necessary for it and its counsel to complete the administration of the estate.
13. The Receiver seeks the approval of the Fees and of the Fee Accrual, as defined in the Second Report, and payment of same.

Holdbacks

14. The Receiver also expects to incur disbursements in the finalization of its administration of the Debtors' estate, and seeks to maintain Holdbacks (as defined and described in the Second Report) to cover certain claims which have, or may have, priority over the claim of TD to same, including the following:

- a. WEPPA claims;
 - b. Holding costs relating to the Kitchener Facility until December 31, 2023;
 - c. HST liabilities owing to CRA; and,
 - d. Potential priority claim of Cluthe, a secured creditor of MPI.
15. The Receiver seeks an order allowing it to maintain the Holdbacks in order to satisfy these claims, if necessary, as set out in the Second Report.

Proposed Distribution

16. The Receiver recommends the distribution as detailed in the Second Report, as follows, and not including the Fee Accrual or the Holdbacks:
- a. Fees;
 - b. The sum of \$976,000.00 to BMO for the BMO Distribution;
 - c. The approximate sum of \$7,500,000.00 to TD for the Interim TD Distribution; and,
 - d. The balance of funds in the estate, less any amounts utilized by the Receiver from the Fee Accrual and/or the Holdbacks, to TD for the Final Distribution. The Receiver anticipates that TD will suffer a shortfall.
- (collectively, the "**Proposed Distribution**").

17. The Receiver seeks approval of the Proposed Distribution.

Discharge

18. Following the completion of the Receiver's remaining duties, including payment of the Fees, the Proposed Distribution, the settlement of any claims relating to the Holdbacks, and the filing of a certificate by the Receiver certifying that all

outstanding matters to be attended to in connection with the Receivership have been completed to the satisfaction of the Receiver, the Receiver will have completed the administration of the estate of the Debtor, and as such requests its discharge as Receiver.

19. Section 243 of the *BIA*.

20. Rules 2, 3, 37, and 38 of the *Rules of Civil Procedure*.

21. The grounds as detailed in the Second Report.

22. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

1. The Appointment Order;
2. The Second Report of the Receiver and the Appendices thereto;
3. Such materials as counsel may advise and this Honourable Court may permit.

December 21, 2023

HARRISON PENSA LLP
Barristers & Solicitors
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London, ON N6A 5R2

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Robert Danter (LSO #69806O)

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Solicitors for the Receiver,
Deloitte Restructuring Inc.

To: Service List

SCHEDULE "A-1" Distribution and Discharge Order (Clean)

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) MONDAY, THE 15th
)
JUSTICE) DAY OF JANUARY, 2024
)

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

DISTRIBUTION AND DISCHARGE ORDER

THIS MOTION, made by Deloitte Restructuring Inc. in its capacity as the Court-appointed receiver (the "**Receiver**") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "**Debtors**"), for an order:

1. If necessary, that the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today, and hereby dispensing with further service and confirmation hereof;
2. Approving the Second Report of the Receiver dated December 21, 2023 (the "**Second Report**") and the activities and conduct of the Receiver set out therein, including the completion of the Receivables and Inventory purchase Agreement (as defined in the Second Report), and noting that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approval of the Second Report;

3. Approving the Fees and the Fee Accrual (each as defined and detailed in the Second Report) of the Receiver and its counsel, and payment thereof;
4. Approving the Receiver's Statement of Receipts and Disbursements (as defined and detailed in the Second Report) as of November 30, 2023;
5. Approving the following distributions, each as defined and described in the Second Report:
 - (a) The BMO Distribution;
 - (b) The Interim TD Distribution; and,
 - (c) The Final Distribution.
6. Approving the maintenance of the Holdbacks by the Receiver, as detailed and defined in the Second Report, and for the purposes set forth therein;
7. Discharging Deloitte Restructuring Inc. as Receiver of the undertaking, property and assets of the Debtors on the filing of the Certificate of Completion in the form attached hereto at Schedule "A", and as provided for in the Second Report ; and
8. releasing Deloitte Restructuring Inc. from any and all liability, as set out in paragraph 8 of this Order,

was heard this day by way of judicial teleconference via Zoom at the Court House, 330 University Avenue, Toronto, Ontario .

ON READING the Receiver's Notice of Motion dated December 21, 2023, the Second Report and all appendices thereto, the affidavits of the Receiver and its counsel as to the Fees (the "**Fee Affidavits**"), and on hearing the submissions of counsel for the Receiver, no one else appearing although served as evidenced by the Affidavit of Service of [NAME] sworn [DATE], filed;

1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today and hereby dispensing with further service and confirmation hereof.

2. THIS COURT ORDERS that the Second Report, and the activities and conduct of the Receiver as set forth therein, including the completion of the Receivables and Inventory purchase Agreement, are hereby approved and that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approval of the Second Report, as detailed herein.

3. THIS COURT ORDERS that the Statement of Receipts and Disbursements be and is hereby approved.

4. THIS COURT ORDERS that the Fees and the Fee Accrual, as set out in the Second Report and the Fee Affidavits, and payment thereof, be and are hereby approved .

5. THIS COURT ORDERS that the Receiver is authorized to maintain the Holdbacks, for the purposes set forth in the Second Report.

6. THIS COURT ORDERS that, after payment of the Fees herein approved, and subject to the Fee Accrual and any amounts utilized by the Receiver from the Holdbacks, the Receiver be and is authorized and directed to make the following distributions, as detailed and described in the Second Report:

- (a) The BMO Distribution;
- (b) The Interim TD Distribution; and,
- (c) The Final Distribution.

7. THIS COURT ORDERS that upon payment of the amounts set out in paragraphs 4,5, and 6 hereof and upon the Receiver filing a certificate certifying that it has completed the other activities described in the Second Report, the Receiver shall be discharged as Receiver of the undertaking, property and assets of the Debtor, provided however that notwithstanding its discharge herein (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Deloitte Restructuring Inc. in its capacity as Receiver.

8. THIS COURT ORDERS AND DECLARES that Deloitte Restructuring Inc. is hereby released and discharged from any and all liability that Deloitte Restructuring Inc. now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of Deloitte Restructuring Inc. while acting in its capacity as Receiver herein, save and except for any gross negligence or wilful misconduct on the Receiver's part. Without limiting the generality of the foregoing, Deloitte Restructuring Inc. is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings, save and except for any gross negligence or wilful misconduct on the Receiver's part.

Justice, Ontario Superior Court of Justice (Commercial List)

**SCHEDULE “A”
CERTIFICATE OF COMPLETION**

Court File No. CV- 23-00699663-00CL

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

CERTIFICATE OF COMPLETION

RECITALS

- A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) dated May 26, 2023 (the “**Appointment Order**”), Deloitte Restructuring Inc. was appointed as receiver (the “**Receiver**”) of the Property (as defined in the Appointment Order) of the Respondents, Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (the “**Debtors**”)
- B. Pursuant to an Order of the Court dated [], 2024, granted by the Honourable Justice [] (the “**Discharge Order**”), the Court authorized and directed the Receiver to make certain distributions and to hold back certain funds, as proposed in the Receiver’s Second Report to the Court dated December 21, 2023 (the “**Second Report**”), and to carry out certain final outstanding matters (the “**Outstanding Matters**”) that were outlined in the Second Report, and further provided that upon the Receiver filing a Certificate of Completion with

this Court certifying that the administration of the Debtors' estate, including the Outstanding Matters, had been completed, the Receiver shall thereby be immediately discharged and the Receiver and all of its directors, officers, partners, employees, agents, attorneys and counsel released from any and all claims in respect of all acts or omissions of any such parties in the performance or intended performance of the Receiver's mandate or any activity related thereto.

THE RECEIVER HEREBY CERTIFIES the following:

1. The Receiver has completed the administration of the Debtors' estate, including the Outstanding Matters, in accordance with the terms of the Second Report and the Discharge Order, such that the discharge and release of the Receiver should now be effective.

DATED at Toronto, Ontario this day of _____, 2023.

**DELOITTE RESTRUCTURING INC.,
in its capacity as Receiver of the Property
of Injection Technologies Inc., Moldco Plastics
Inc., and Moldco Holdings Inc.,
and not in its personal or corporate capacity**

Per: Jordan Sleeth, LIT

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

**ORDER
(DISTRIBUTION AND DISCHARGE)**

HARRISON PENZA ^{LLP}
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Lawyers for the Receiver,
Deloitte Restructuring Inc.

SCHEDULE "A-2" Distribution and Discharge Order (Blacklined)

Revised: May 11, 2010

Court File No. CV- 23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) ~~WEEKDAY~~^{MONDAY}, THE #~~15~~¹⁵th
JUSTICE) DAY OF ~~MONTH~~^{JANUARY}, ~~20~~²⁰~~YR~~²⁰²⁴

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BETWEEN:

THE TORONTO-DOMINION BANK

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Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents **PLAINTIFF**

Plaintiff

-and-

DEFENDANT

Defendant

DISTRIBUTION AND DISCHARGE ORDER

THIS MOTION, made by ~~{RECEIVER'S NAME}~~^{Deloitte Restructuring Inc.} in its capacity as the Court-appointed receiver (the "**Receiver**") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. ~~{DEBTOR}~~ (collectively, the "**Debtors**"), for an order:

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1. If necessary, that the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today, and hereby dispensing with further service and confirmation hereof;

~~2.~~ Approving the Second activities of the Receiver as set out in the Report of the Receiver dated ~~{DATE}~~ December 21, 2023 (the "Second Report") and the activities and conduct of the Receiver set out therein, including the completion of the Receivables and Inventory purchase Agreement (as defined in the Second Report), and noting that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approval of the Second Report (the "Report");

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3. Approving the fees and disbursements Fees and the Fee Accrual (each as defined and detailed in the Second Report) of the Receiver and its counsel, and payment thereof;

4. Approving the Receiver's Statement of Receipts and Disbursements (as defined and detailed in the Second Report) as of November 30, 2023;

5. Approving the following distributions, each as defined and described in the Second Report:

(a) The BMO Distribution;

(b) The Interim TD Distribution; and,

(c) The Final Distribution.

6. Approving the maintenance of the Holdbacks by the Receiver, as detailed and defined in the Second Report, and for the purposes set forth therein;

2. —

~~3. Approving the distribution of the remaining proceeds available in the estate of the Debtor; and~~

~~4.~~ Discharging ~~{RECEIVER'S NAME}~~ Deloitte Restructuring Inc. as Receiver of the undertaking, property and assets of the Debtor; ~~s on the filing of the Certificate of Completion in the form attached hereto at Schedule "A", and as provided for in the Second Report;~~ and

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~~5.8.~~ releasing Deloitte Restructuring Inc. [RECEIVER'S NAME] from any and all liability, as set out in paragraph ~~5.8~~ of this Order¹,

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was heard this day by way of judicial teleconference via Zoom at the Court House, 330 University Avenue, Toronto, Ontario at 330 University Avenue, Toronto, Ontario.

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ON READING the Receiver's Notice of Motion dated December 21, 2023, the Second Report and all appendices thereto, the affidavits of the Receiver and its counsel as to ~~fees~~ the Fees (the "Fee Affidavits"), and on hearing the submissions of counsel for the Receiver, no one else appearing although served as evidenced by the Affidavit of Service of [NAME] sworn [DATE], filed²;

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1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today and hereby dispensing with further service and confirmation hereof.

2. THIS COURT ORDERS that the Second Report, and the activities and conduct of the Receiver as set forth therein, including the completion of the Receivables and Inventory purchase Agreement, are hereby approved and that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way the approval of the Second Report, as detailed herein.~~THIS COURT ORDERS that the activities of the Receiver, as set out in the Report, are hereby approved.~~

6.3. THIS COURT ORDERS that the Statement of Receipts and Disbursements be and is hereby approved.

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4. THIS COURT ORDERS that the Fees and the Fee Accrual, as set out in the Second Report and the Fee Affidavits, and payment thereof, be and are hereby approved ~~the fees and disbursements of the Receiver and its counsel, as set out in the Report and the Fee Affidavits, are hereby approved.~~

¹ If this relief is being sought, stakeholders should be specifically advised, and given ample notice. See also Note 4, below.

² This model order assumes that the time for service does not need to be abridged.

7.5. THIS COURT ORDERS that the Receiver is authorized to maintain the Holdbacks, for the purposes set forth in the Second Report.

6. THIS COURT ORDERS that, after payment of the Fees herein approved, and subject to the Fee Accrual and any amounts utilized by the Receiver from the Holdbacks, the Receiver be and is authorized and directed to make the following distributions, as detailed and described in the Second Report;~~after payment of the fees and disbursements herein approved, the Receiver shall pay the monies remaining in its hands to [NAME OF PARTY]³~~

(a) - The BMO Distribution;

(b) The Interim TD Distribution; and,

8-(c) The Final Distribution.

9.7. THIS COURT ORDERS that upon payment of the amounts set out in paragraphs 3-4.5, and 6 hereof ~~and upon the Receiver filing a certificate certifying that it has completed the other activities described in the Second Report,~~ the Receiver shall be discharged as Receiver of the undertaking, property and assets of the Debtor, provided however that notwithstanding its discharge herein (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Deloitte Restructuring Inc.~~[RECEIVER'S NAME]~~ in its capacity as Receiver.

10.8. ~~THIS COURT ORDERS AND DECLARES~~ that Deloitte Restructuring Inc.~~[RECEIVER'S NAME]~~ is hereby released and discharged from any and all liability that Deloitte Restructuring Inc.~~[RECEIVER'S NAME]~~ now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of ~~[Deloitte Restructuring Inc. RECEIVER'S NAME]~~ while acting in its capacity as Receiver herein, save and except for any gross negligence or wilful misconduct on the Receiver's part. Without limiting the generality of the foregoing, Deloitte Restructuring Inc.~~[RECEIVER'S NAME]~~ is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within

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³ ~~This model order assumes that the material filed supports a distribution to a specific secured creditor or other party.~~

receivership proceedings, save and except for any gross negligence or wilful misconduct on the Receiver's part.⁴

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Justice, Ontario Superior Court of Justice (Commercial List)

⁴The model order subcommittee was divided as to whether a general release might be appropriate. On the one hand, the Receiver has presumably reported its activities to the Court, and presumably the reported activities have been approved in prior Orders. Moreover, the Order that appointed the Receiver likely has protections in favour of the Receiver. These factors tend to indicate that a general release of the Receiver is not necessary. On the other hand, the Receiver has acted only in a representative capacity, as the Court's officer, so the Court may find that it is appropriate to insulate the Receiver from all liability, by way of a general release. Some members of the subcommittee felt that, absent a general release, Receivers might hold back funds and/or wish to conduct a claims bar process, which would unnecessarily add time and cost to the receivership. The general release language has been added to this form of model order as an option only, to be considered by the presiding Judge in each specific case. See also Note 1, above.

SCHEDULE "A"
CERTIFICATE OF COMPLETION

Court File No. CV- 23-00699663-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.

Respondents

CERTIFICATE OF COMPLETION

RECITALS

- A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (Commercial List) (the "**Court**") dated May 26, 2023 (the "**Appointment Order**"), Deloitte Restructuring Inc. was appointed as receiver (the "Receiver") of the Property (as defined in the Appointment Order) of the Respondents, Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (the "Debtors")
- B. Pursuant to an Order of the Court dated [], 2024, granted by the Honourable Justice [] (the "**Discharge Order**"), the Court authorized and directed the Receiver to make certain distributions and to hold back certain funds, as proposed in the Receiver's Second Report

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to the Court dated December 21, 2023 (the “Second Report”), and to carry out certain final outstanding matters (the “Outstanding Matters”) that were outlined in the Second Report, and further provided that upon the Receiver filing a Certificate of Completion with this Court certifying that the administration of the Debtors’ estate, including the Outstanding Matters, had been completed, the Receiver shall thereby be immediately discharged and the Receiver and all of its directors, officers, partners, employees, agents, attorneys and counsel released from any and all claims in respect of all acts or omissions of any such parties in the performance or intended performance of the Receiver’s mandate or any activity related thereto.

THE RECEIVER HEREBY CERTIFIES the following:

1. The Receiver has completed the administration of the Debtors’ estate, including the Outstanding Matters, in accordance with the terms of the Second Report and the Discharge Order, such that the discharge and release of the Receiver should now be effective.

DATED at Toronto, Ontario this day of _____, 2023.

**DELOITTE RESTRUCTURING INC.,
in its capacity as Receiver of the Property
of Injection Technologies Inc., Moldco Plastics
Inc., and Moldco Holdings Inc.,
and not in its personal or corporate capacity**

Per: Jorden Sleeth, LIT

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

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Applicant

Respondents

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Court File No. CV-23-00699663-00CL

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ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

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ORDER
(DISTRIBUTION AND DISCHARGE)

HARRISON PENZA ^{LLP}
Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

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Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

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Email: thogan@harrisonpensa.com
rdanter@harrisonpensa.com

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Lawyers for the Receiver,
Deloitte Restructuring Inc.

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

NOTICE OF MOTION

HARRISON PENZA ^{LLP}
Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
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Lawyers for the Receiver,
Deloitte Restructuring Inc.

Tab 2

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

**SECOND REPORT OF DELOITTE RESTRUCTURING INC.
IN ITS CAPACITY AS THE RECEIVER AND MANAGER
DATED DECEMBER 21, 2023**

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APPENDICES

APPENDIX	DESCRIPTION
A	Receivership Order
B	First Report (Without Appendices)
C	Pre-Filing Report (Without Appendices)
D	AarKel AVO
E	Auction AVO
F	Ancillary Order
G	Receiver's Certificate (AarKel Transaction)
H	Receivables and Inventory Purchase Agreement dated September 22, 2023
I	Receiver's Certificate (Auction Transaction)
J	Receiver's Statement of Receipts and Disbursements
K	TD Opinion
L	Affidavit of Jordan Sleeth sworn December 20, 2023
M	Affidavit of Matilda Lici sworn December 20, 2023
N	Affidavit of Thomas Masterson sworn December 21, 2023

INTRODUCTION

1. On May 26, 2023, Deloitte Restructuring Inc. (“**Deloitte**”) was appointed receiver and manager (in such capacity, the “**Receiver**”) of the assets, undertakings and properties (collectively, the “**Property**”) of Injection Technologies Inc. (“**ITI**”), Moldco Plastics Inc. (“**MPI**”), and Moldco Holdings Inc. (“**Moldco Holdings**”, and together with ITI and MPI, the “**Debtors**”) pursuant to an order (the “**Receivership Order**”) of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”). A copy of the Receivership Order is attached hereto as **Appendix “A”**.
2. Copies of the Receivership Order, together with other materials filed with the Court, Receiver’s reports and stakeholder notices (e.g., BIA s.245 and 246 notices) with respect to this matter are available on the Receiver’s case website at www.insolvencies.deloitte.ca/en-ca/InjectionTechnologies.
3. On August 15, 2023, the Receiver issued its first report (the “**First Report**”) to the Court to:
 - (a) request approval of the transaction contemplated by the Asset Purchase and Sale Agreement dated July 28, 2023, between the Receiver and AarKel Testing Technologies Inc. (“**AarKel**”) for the sale of certain Property located at the Debtors’ premises in Windsor, Ontario (the “**Windsor Facility**”) (consummated as the “**AarKel Transaction**”);
 - (b) request approval of the transaction contemplated by the Auction Service Agreement between the Receiver and Corporate Assets Inc. (the “**Auctioneer**”) dated August 4, 2023 (the “**Auction Agreement**”). The Auction Agreement included

substantially all the machinery and equipment located at the Debtors' premises in Kitchener, Ontario (the "**Kitchener Facility**") and certain residual assets located at the Windsor Plant (the "**Auctioneer Purchased Assets**") to be included in an auction conducted by the Auctioneer under the Auction Agreement (the "**Auction Transaction**").

4. A copy of the First Report without Appendices is attached hereto as **Appendix "B"**.
5. A copy of the Pre-Filing Report of the Receiver dated May 19, 2023 (without Appendices) as referred to in the First Report is attached hereto as **Appendix "C"** ("**Pre-Filing Report**")
6. On August 25, 2023, the Court issued the following Orders:
 - (a) An Approval and Vesting Order with respect to the Aarkel Transaction (the "**AarKel AVO**");
 - (b) An Approval and Vesting Order with respect to the Auction Transaction (the "**Auction AVO**");
 - (c) An Ancillary Order approving the First Report and the Statement of Receipts and Disbursements in the First Report, and sealing the Confidential Appendices (the "**Ancillary Order**"); and,
 - (d) Copies of the AarKel AVO, Auction AVO and Ancillary Order are attached hereto as **Appendix "D"**, "**E**" and "**F**" respectively.
7. This purpose of this second report of the Receiver (the "**Second Report**") is to:

- (a) provide the Court with an update in respect of the activities of the Receiver since it issued the First Report, including the Receiver's ongoing efforts to collect all remaining amounts due to the Debtors and supervision of the Kitchener Facility;
- (b) provide an update on the closing of the AarKel Transaction and the post-closing working capital transaction;
- (c) provide an update on the closing of the Auction Transaction and the results of the Auction Transaction;
- (d) advise the court of the bankruptcy of ITI and MPI;
- (e) advise the Court of the various security interests in the Debtors' property;
- (f) advise the Court on the status of CRA's review of the Debtors' and the Receiver's payroll, HST and income tax account filings and audits;
- (g) advise the Court of the tasks remaining in the administration of the Receivership;
- (h) provide the Court with an evidentiary basis to make orders:
 - i. approving this Second Report¹ and the activities of the Receiver as described herein;
 - ii. approve the Receiver's Statement of Receipts and Disbursements for the period May 26, 2023 to November 30, 2023;
 - iii. authorizing the BMO Distribution (as defined below) to Bank of Montreal ("**BMO**");

¹ Noting that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way any approval of the Second Report, if granted by the Court.

- iv. authorizing the Interim TD Distribution (as defined below) to The Toronto Dominion Bank (“**TD Bank**”);
- v. authorizing the Holdbacks (as defined below) in relation to any costs or payments required to complete the administration of the estate;
- vi. authorizing the Fees and the Fee Accrual (each as defined below), and payment of same;
- vii. authorizing the Final Distribution (as defined below) to TD Bank, up to the indebtedness owing to TD Bank under credit agreements with the Debtors and security granted by the Debtors to TD Bank;
- viii. approving the fees and costs of the Receiver and its legal counsel as described herein and in the fee affidavits appended to this Second Report (the “**Fees**”) and a Fee Accrual (as defined below), and payment of same; and,
- ix. discharging Deloitte as the Receiver on the filing of the Certificate of Completion as provided for in this Second Report, and releasing the Receiver from liability for its actions while acting in such capacity, save and except for the Receiver’s gross negligence or willful misconduct.

TERMS OF REFERENCE

- 8. In preparing this Second Report, the Receiver has been provided with, and has relied upon, unaudited, draft and/or internal financial information, the Debtors’ books and records, and

discussions with management of the Debtors (“**Management**”) (collectively, the “**Information**”). Except as described in this Second Report:

- (a) Deloitte has reviewed the Information for reasonableness, internal consistency and use in the context in which it was provided. However, Deloitte has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards (“**CAS**”) pursuant to the Chartered Professional Accountants Canada Handbook, and, accordingly, Deloitte expresses no opinion or other form of assurance contemplated under CAS in respect of the Information; and
 - (b) Deloitte has prepared this Second Report in its capacity as the Receiver for solely the purposes noted herein. Parties using this Second Report other than for the purposes outlined herein are cautioned that it may not be appropriate for their purposes.
9. Unless otherwise stated, all dollar amounts contained in the Report are expressed in Canadian dollars.
 10. Capitalized terms not defined herein shall have the meaning ascribed to them in the Receivership Order, Pre-Filing Report, or the First Report, as applicable.

UPDATE ON THE RECEIVER’S ACTIVITIES SINCE ITS APPOINTMENT

11. In addition to the activities outlined in the First Report, the Receiver has undertaken the following activities in accordance with the terms of the Receivership Order:

- (a) routinely attended the Windsor Facility and Windsor Warehouse up to the date of lease assignment on September 6, 2023;
- (b) routinely attended the Kitchener Facility;
- (c) concluded security services at the Kitchener Facility;
- (d) concluded production of parts at the Kitchener Facility on August 31, 2023, sending a discontinuation notice to all remaining customers;
- (e) terminated the retention agreements with those Debtor employees retained by the Receiver prior to September 25, 2023;
- (f) terminated and released several leased forklifts and printers;
- (g) secured insurance coverage to permit production at both locations until August 18, 2023 (Kitchener) and September 5, 2023 (Windsor). The Kitchener facility remains insured for loss and damage until December 31, 2023;
- (h) retained a former employee, to check in at the Kitchener facility daily and ensure all chattels remain in place and the property is secured appropriately;
- (i) monitor and record daily receipts and disbursements;
- (j) pursued collection of amounts due to the Debtors pursuant to the settlement agreements entered into with customers;
- (k) secured and imaged the laptop of the Debtors' former Controller to preserve all financial information related to the operating period of the Receivership;

- (l) prepared and filed HST returns with the CRA for the Receivership period from May 26 to October 31, 2023 and making remittances up to and including July 31, 2023;
- (m) updated the Receiver's website with all relevant information to creditors, including a letter advising tool owners of the Receiver's intention to dispose of obsolete tools and information related to the bankruptcy filings of ITI and MPI (discussed herein);
- (n) reviewed and responded to inquiries from creditors;
- (o) provided status updates on the progress of the receivership to TD Bank; and
- (p) addressed additional matters as they arose from time to time.

COLLECTION EFFORTS TO DATE

12. As at November 30, 2023, the Receiver entered into interim and final settlement and release agreements with 63 customers of the Debtors that provided for, among other things, payment to the Receiver of an agreed amount with respect to outstanding accounts receivable, the sale of inventory on hand and/or additional parts produced by the Receiver and set-off claims of certain customers. These claims also provided for the return of customers' tools, the sale of customer specific component parts and the return of Computer-Aided Design drawings and other design data.
13. The table below sets out total cash recoveries of pre-receivership A/R and post-receivership operations to November 30, 2023, in the approximate amounts of CAD \$7.5 million plus US \$2.0 million:

Description (amounts are presented in 000s)	Net book value²	CAD	USD	Total (CAD)	Recovery %
Collection of outstanding accounts receivable as at May 25, 2023	4,113	2,592	709	3,555	86.4%
Collections from post-receivership sales	N/A	5,023	1,298	6,991	N/A
Total cash receipts to November 30, 2023		7,455	1,993	10,546	

UPDATE ON CLOSING OF THE AARKEL TRANSACTION

14. As detailed in the First Report, on July 28, 2023, the Receiver entered into an agreement to sell assets located at the Windsor Facility to AarKel Testing Technologies Inc. (“**AarKel**”). As outlined in the First Report, the assets purchased in the AarKel APA included:

- (a) machinery, equipment and other assets described in Lot 1(a) excluding certain residual assets to be sold under the Auction Transaction;
- (b) machinery described in Lot 1(b) re the BMO Unit (the “BMO Asset”);
- (c) machinery, equipment and other assets described in Lot 3; and
- (d) intellectual property used exclusively in the Windsor business.

15. As detailed in the First Report, there were several conditions required to close the AarKel Transaction whereby the Receiver and AarKel worked to address the conditions and close the transaction, including:

- (a) the Receiver obtained the Aarkel AVO, the Auction AVO and the Ancillary Order;

² This amount represents the net book value of accounts receivable at May 25, 2023, measured in Canadian dollars at the November 30, 2023, USD to CAD foreign exchange rate of 1.3582.

- (b) AarKel paid the balance of the purchase price to the Receiver on September 6, 2023;
 - (c) the Receiver obtained consent to assign the real property lease from the landlords of the Windsor Facility and Windsor Warehouse, which included the resolution of cure costs that were paid by the Receiver;
 - (d) BMO agreed to the price allocated to the BMO Asset, amounting to \$976,000, and the Receiver delivered title to the BMO unit to AarKel, free and clear of any encumbrances;
 - (e) the Receiver's Certificate, substantially in the forms appended to the AarKel AVO certifying that the subject transaction closed, was filed with the Court on September 6, 2023. A copy of the Receiver's Certificate in relation to the AarKel Transaction is attached hereto as "**Appendix G**".
16. Following the closing of the AarKel Transaction, the Receiver and AarKel negotiated an agreement whereby AarKel purchased select raw material inventory, resins and spare parts and substantially all of the accounts receivable pertaining to the Windsor tryout business (the "**Receivables and Inventory Purchase Agreement**"). A copy of the Receivables and Inventory Purchase Agreement is attached hereto as "**Appendix H**".
17. A summary of the non-commercially sensitive key terms of the Receivables and Inventory Purchase Agreement is provided below.

Summary of the Receivables and Inventory Purchase Agreement	
Purchaser	<ul style="list-style-type: none">• AarKel Testing Technologies Inc.
Transaction Type	<ul style="list-style-type: none">• Sale of assets
Date of Execution	<ul style="list-style-type: none">• September 22, 2023

Summary of the Receivables and Inventory Purchase Agreement	
Purchased Assets	<ul style="list-style-type: none"> • Certain accounts receivable in respect of the Debtors’ tryout business, as set out in Schedule A of the Receivables and Inventory Purchase Agreement. • Certain raw material inventory, resins and spare parts, as set out in Schedule B of the Receivables and Inventory Purchase Agreement.
Purchase Price	<ul style="list-style-type: none"> • Certain accounts receivable were sold at an amount equal to the full value (the Receivables Price”). • Certain inventory was purchased at an agreed upon price.
Payment of Purchase Price	<ul style="list-style-type: none"> • AarKel retained an amount equal to 10% of the Receivables Price to allow for a period where the Receiver may collect payments on behalf of AarKel in the event customers send payments to the Receiver.

18. The Receivables and Inventory Purchase Agreement was entered into to facilitate collections of tryout amounts due to the Debtors while minimizing confusion for customers remaining with the tryout business acquired by AarKel. Further, raw material inventory sold pursuant to this agreement was to reimburse the Debtors for raw materials purchased in bulk quantities prior to closing the AarKel Transaction that AarKel would use post closing. The value of this transaction was \$746,621.

19. As of November 30, 2023, the Receiver and AarKel have reconciled amounts due between the parties pursuant to the Receivables and Inventory Purchase Agreement and AarKel remitted the balance due to the Receiver. Accordingly, the Receivables and Inventory Purchase Agreement is complete.

20. The total transaction value pursuant to the Receivables and Inventory Purchase Agreement was less than the \$1 million threshold for the Receiver to complete transactions without

the approval of the Court. As this supplementary transaction was essentially and an advance on accounts receivable and recovery of purchased inventory done to facilitate the post-closing customer transition, the Receiver proceeded to consummate and complete this transaction without the prior approval of the Court.

UPDATE ON THE CLOSING OF THE AUCTION TRANSACTION

21. As detailed in the First Report, the Receiver entered into an auction agreement with Corporate Assets Inc. (“**Corporate Assets**” or the “**Auctioneer**”) on August 4, 2023, to sell substantially all assets at the Kitchener Facility and select assets in the Windsor Facility. Corporate Assets offered the Receiver a net minimum guarantee (“**NMG**”) amount with profit sharing above a set threshold in excess of the NMG. Corporate Assets auctioned these assets online in October and November, 2023 and is arranging their removal by December 15, 2023 (which deadline has been extended by the Receiver to December 22, 2023).
22. As detailed in the First Report, the Auction Transaction was subject to several conditions to be satisfied prior to closing. On August 25, 2023, the Court granted an Approval and Vesting Order in respect of the Auction Agreement with Corporate Assets, subject to the delivery of a Receiver Certificate to Corporate Assets.
23. Following the Auction AVO, the Receiver completed a bill of sale conveying to the Auctioneer the right, title and interest of the Debtors’ interest in and to the Auctioneer Purchased Assets free from all liens and encumbrances on an “as is, where is” basis.

24. Corporate Assets paid the balance of the NMG to the Receiver on October 11, 2023. The results of the auctions did not exceed the profit-sharing threshold.
25. The Receiver issued the Receiver Certificate to Corporate Assets on December 20, 2023 and has subsequently filed same with the Court. A copy of the Receiver's Certificate in relation to the Auction Transaction is attached hereto as "**Appendix I**".
26. Pursuant to the Auction Agreement, Corporate Assets is to return the Kitchener Facility to the Receiver in a broom-swept condition by December 15, 2023 (which deadline has been extended by the Receiver to December 22, 2023). Following this, the Receiver will return the property to the landlord.

INJECTION TECHNOLOGIES INC. AND MOLDCO PLASTICS INC. BANKRUPTCY

27. Pursuant to paragraph 3(p) of the Receivership Order, the Receiver has the powers to "file an assignment into bankruptcy, and act as trustee in bankruptcy, on behalf of any or all of the Debtors", which includes ITI and MPI.
28. On October 11, 2023 (the "**Date of Bankruptcy**"), the Receiver assigned ITI and MPI into bankruptcy and the Official Receiver named Deloitte as the Licensed Insolvency Trustee (in such capacity, the "**Trustee**") of both bankrupt estates. The bankruptcy assignments will allow for an orderly and efficient wind-down of ITI and MPI while allowing for the alignment of priority claims and crystallizing of various creditor claims.
29. Since the Date of Bankruptcy, the Trustee has complied with the notice requirements set out in the BIA. The first meeting of creditors of ITI and MPI (the "**FMOC**") was held virtually on November 1, 2023. Deloitte's appointment as trustee in bankruptcy was affirmed at the FMOC of both ITI and MPI.

STATEMENT OF RECEIPTS AND DISBURSEMENTS

30. Attached as **Appendix “J”** is a consolidated Statement of Receipts and Disbursements (“**R&D**”) for the period May 26, 2023 to November 30, 2023 including the Receiver’s estimate of future amounts to be realized and incurred. As at November 30, 2023, the closing cash balance was approximately CAD \$9.5 million plus approximately US \$983,000. A summary of the R&D is presented below.

Receipts and Disbursements amounts presented in 000s	Combined		
	\$ CAD	\$ USD	Total in \$ CAD
Receipts			
Sale of Assets	7,153	-	7,153
Collection of opening accounts receivable	2,592	709	3,555
Collection from new sales	5,023	1,298	6,786
HST collected	857	38	909
Transfers between Receivership trust accounts	(0)	(0)	(0)
Interest & other cash receipts	95	6	103
Total Receipts	15,739	2,051	18,524
Disbursements			
Payroll and related benefits	(2,017)	-	(2,017)
Cost of Goods Sold	(344)	(959)	(1,647)
Rent	(706)	-	(706)
Overhead Costs	(312)	(28)	(349)
Utilities	(245)	-	(245)
Other manufacturing costs	(84)	(1)	(85)
Other operating costs	(39)	0	(39)
HST paid	(512)	(80)	(621)
Professional Fees	(1,985)	-	(1,985)
Total disbursements	(6,244)	(1,068)	(7,694)
Ending cash balance	9,495	983	10,831

31. As outlined in the R&D at Appendix J, which includes estimates for certain receipts and disbursements to finalize the receivership, there are select amounts that remain to be realized as follows:

- (a) Collections from certain customers for the production of parts throughout the Receivership period. A significant portion of the remaining amounts to be collected

is due from one customer. The Receiver remains in communication with this customer and expects the payment to be made in the near term; and

- (b) The Receiver is attempting to resolve CRA's deemed trust claim in ITI on account of unremitted payroll source deductions (described in Paragraph 45 of the Pre-Filing Report). The CRA account statements indicate that a payroll source deduction obligation of approximately \$1.35 million is owing from ITI. However, the MPI payroll account statements indicate that a refund is due to MPI of approximately \$859,000 as the Debtors incorrectly remitted ITI payroll source deductions under the MPI CRA payroll account. Once the Receiver responds to CRA's audit inquiries, it anticipates that the refund on MPI's account will be refunded and then used to fund the ITI deemed trust obligation, along with approximately \$489,000 from realizations from ITI's assets.

32. As outlined in the R&D at Appendix J, there are costs to be incurred by the Receiver to finalize its administration and certain claims against the funds realized that have or may have priority to TD's security (collectively, the "**Holdbacks**"). The following summarizes each of the reserves:

- (a) Since the First Report, the Receiver has refiled WEPPA in connection with the Bankruptcy of ITI and MPI. Based on the employee information provided to Service Canada calculated the Receiver estimates that approximately \$69,000 may be subject to a limited super priority pursuant to Section 81.4 of the BIA. Payment of this claim to Service Canada once it files a claim will be in priority to TD's security;
- (b) The Receiver will continue to incur holding costs related to the Kitchener facility until it is returned to the landlord on or prior to December 31, 2023;

- (c) The Receiver estimates that it will collect HST in excess of input tax credits resulting in an HST liability to the CRA of approximately \$300,000, which amounts will be remitted to the CRA as the Receiver completes the administration of the receivership;
 - (d) The Receiver continues to review the claim of the Cluthe Family Trust (“**Cluthe**”), noting that at the date of this Second Report, Cluthe does not hold a PPSA registration against ITI, MPI nor Moldco Holdings; however, such liability is recorded in the Debtor’s accounts. As such, a reserve has been provided for this potential claim. Counsel for the Receiver did contact counsel for Cluthe on August 15, 2023 to request Cluthe’s security documents and evidence of the underlying debt but did not receive a reply. Counsel for the Receiver has attempted to contact Cluthe counsel again as at December 12, 2023 and December 18, 2023 with no response as of the date of this Second Report.
 - (e) The Receiver is aware that the Ministry of Labour (“**MoL**”) has commenced proceedings as against ITI pursuant to the *Occupational Health and Safety Act* (“**OSHA**”) (the “**MoL Proceeding**”). The MoL Proceeding relates to an injury suffered by an ITI employee in August 2022, which the MoL alleges was caused due to certain OSHA breaches by ITI. It is the Receiver’s position that any fine or penalty arising from the MoL Proceeding would constitute an unsecured claim in these proceedings, and the Receiver does not intend to expend estate assets in defending the MoL Proceeding as a result.
33. After considering each of the remaining realizations, costs and distributions to creditors with priority claims, the Receiver estimates that the net amount available to TD Bank will be approximately \$7.4 to \$8.5 million depending on how potential priority claims are

settled. This represents a shortfall of approximately \$7.0 to \$8.1 million on TD's secured advances to the Debtors.

34. As reported in the First Report, the security held by TD Bank has been reviewed by Harrison Pensa LLP ("**HP**") as independent counsel for the Receiver, and it is the opinion of Receiver's counsel that TD Bank's security with respect to the Debtors is valid and perfected pursuant to the provisions of the PPSA. Attached as **Appendix "K"** is a copy of HP's opinion to the Receiver (the "**TD Opinion**").
35. As reported in the First Report, HP has reviewed the security held by BMO and has confirmed that such security is valid and enforceable over the BMO Asset.

RECEIVER'S COMMENDATION TO MAKE AN INTERIM DISTRIBUTION

36. Based on the TD Opinion, a review of the security pledged by the Debtors concluded in favour of the TD Security and in favour of BMO, with respect to the BMO Unit. As such, TD has security with a first ranking, with the exception of the BMO Unit, over the funds in the Receiver's trust accounts, subject to any claims with statutory or other priority that ranks ahead of TD's or BMO's claims.
37. The Receiver is seeking the Court's approval to make a final distribution to BMO from the funds held by the Receiver with respect to BMO's security over the BMO Unit, outlined herein and in the Security Opinion (the "**BMO Distribution**"). The agreed amount is \$976,000.
38. The Receiver is seeking the Court's approval to make an interim distribution to TD Bank of approximately \$7.5 million, being the net estimated realizations in the receivership less

amounts due BMO, Service Canada, CRA, the Fee Accrual, and the Holdbacks reserve for unforeseen disbursements (the “**Interim TD Distribution**”). The Receiver is also seeking the Court’s approval to make a final distribution to TD Bank all remaining funds held by the Receiver after the completion of the administration of the receivership up to the value of TD Bank’s advances (the “**Final Distribution**”). As noted in the Receiver’s Statement of Receipts and Disbursements in Schedule B, the amount due to TD Bank is approximately \$15.6 million and anticipated net realizations will not be sufficient to repay TD Bank in full.

REMAINING TASKS TO COMPLETE RECEIVERSHIP

39. The task remaining to complete the administration of the Receivership include:
- (a) Collecting outstanding amounts due from five customers;
 - (b) The Receiver is in the process of negotiating the assignment of MPI’s lease over the Kitchener Premises to the current sublessor, Clek Inc., and will continue to communicate with Clek Inc. and the landlord of the Kitchener Premises in this regard;
 - (c) Respond to CRA’s audit inquiries in respect of the Debtors’ payroll accounts and resolving the source deduction deemed trust amount;
 - (d) Remit amounts due to Service Canada in respect of its claim in the Receivership related to former employees’ WEPPA claims;
 - (e) Monitor the auctioneer’s exit of the Kitchener premises and return the property to the landlord;
 - (f) Issue the BMO Distribution and the Interim TD Distribution; and

- (g) Issue the Final Distribution to TD Bank, consisting of the balance of funds in the estate, less any amounts utilized by the Receiver from the Fee Accrual and/or utilized by the Receiver in relation to the Holdbacks.

RECEIVER'S PROFESSIONAL FEES

- 40. The Receiver, and its legal counsel, HP and A&B, have maintained detailed records of their professional time and costs since the date of the Receivership Order.
- 41. The total fees of the Receiver during the period from May 26, 2023 to December 2, 2023 total \$1,792,088, together with expenses and disbursements in the sum of \$47,476 and HST in the amount of \$239,143, totalling \$2,078,708. The aforementioned has been particularly described in the Affidavit of Jordan Sleeth sworn December 20, 2023 attached hereto as Appendix "L" (the "**Sleeth Affidavit**").
- 42. The total fees of A&B, in its capacity as counsel to the Receiver, during the period from June 1, 2023 to September 22, 2023, total \$118,054.50, together with expenses and disbursements in the sum of \$41.40 and HST in the amount of \$15,352.47, totalling \$133,448.37. The aforementioned has been particularly described in the Affidavit of Matilda Lici sworn December 20, 2023 attached hereto as Appendix "M" (the "**Lici Affidavit**").
- 43. The total fees of Harrison Pensa, in its capacity as counsel to the Receiver, during the period from May 15, 2023, to November 30, 2023 total \$60,205, together with expenses and disbursements in the sum of \$4,130.45 and HST in the amount of \$6,880.79, totalling \$71,216.24. The aforementioned has been particularly described in the Affidavit of

Thomas Masterson sworn December 21, 2023, attached hereto as Appendix “N” (the “**Masterson Affidavit**”).

44. The Receiver is of the view that the fees and disbursements of its legal counsel are reasonable. The Receiver’s fees and disbursements as well as those of its legal counsel have been presented to TD Bank and it has no objections or concerns with the fees presented. The Receiver is currently seeking the approval of the Court of the Receiver’s activities and its fees and disbursements, including the fees and disbursements of its legal counsel, as described in this Second Report.
45. Provided there is no opposition to the relief sought in the Receiver’s Motion and that such relief is granted, the Receiver estimates that the additional fees and disbursements necessary to complete these proceedings will be approximately \$250,000 not including disbursements and HST. Such accrual includes invoices issued but not paid as of November 30, 2023 with fees that total approximately \$135,000 (collectively, the “**Fee Accrual**”).

Holdbacks

46. In addition to the Fee Accrual, the Receiver will utilize the Holdbacks to complete the administration of the Receivership.

RECEIVER’S RECOMMENDATIONS

47. For the reasons set out above, the Receiver recommends that the Court make Orders:
 - (a) approving this Second Report and the activities of the Receiver, including steps taken in dealing with the Property, as described in this Second Report;

- (b) authorizing the BMO Distribution in the sum of \$976,000;
- (c) authorizing the Interim TD Distribution in the sum of \$7,500,000;
- (d) authorizing the Receiver to hold the sum of approximately \$1.25 million as the Holdbacks, for the purposes set forth herein;
- (e) authorizing the Receiver to hold the sum of \$250,000 in relation to the Fee Accrual, and authorizing payment of same;
- (f) authorizing the Final Distribution to TD Bank up to the value of its secured advances to the Debtors;
- (g) approving the Receiver's Statement of Receipts and Disbursements for the period May 26, 2023 to November 30, 2023;
- (h) approving the Receiver's fees and disbursements as set out in the Sleeth Affidavit, and authorizing payment of same;
- (i) approving the fees and disbursements of A&B as set out in the Lici Affidavit, and authorizing payment of same;
- (j) approving the fees and disbursements of Harrison Pensa as set out in the Masterson Affidavit, and authorizing payment of same; and,
- (k) ordering that the Receiver be discharged on filing a certificate of completion with this Court, and releasing the Receiver from liability for its actions while acting in such capacity, save and except for the Receiver's gross negligence or willful misconduct.

All of which is respectfully submitted this 21st day of December, 2023.

DELOITTE RESTRUCTURING INC.,
solely in its capacity as the Court-appointed
Receiver of Injection Technologies Inc.,
Moldco Plastics Inc., and Moldco Holdings
Inc., and without personal or corporate
liability

Per:



Jorden Sleeth, CPA, CA, CIRP, LIT
Senior Vice-President

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

SECOND REPORT OF THE RECEIVER

HARRISON PENZA ^{LLP}

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Lawyers for the Receiver,
Deloitte Restructuring Inc.

APPENDIX "A"

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

THE HONOURABLE MADAM) FRIDAY, THE 26TH
)
JUSTICE STEELE) DAY OF MAY, 2023

THE TORONTO-DOMINION BANK

Applicant

and

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

**ORDER
(appointing Receiver)**

THIS MOTION made by the Applicant for an Order pursuant to section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the "**BIA**") and section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended (the "**CJA**") appointing Deloitte Restructuring Inc. ("**Deloitte**") as receiver and manager (in such capacities, the "**Receiver**") without security, of all of the assets, undertakings and properties of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "**Debtor**") acquired for, or used in relation to a business carried on by the Debtor, was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the affidavit of Mathieu Lafortune sworn May 15, 2023 and the Exhibits thereto, and the Pre-Filing Report of Deloitte dated May 19, 2023, and on hearing the submissions of counsel for the Applicant, the Receiver and the Respondents, no else appearing

although duly served as appears from the affidavit of service of Matilda Lici sworn May 17, 2023 and on reading the consent of Deloitte to act as the Receiver,

SERVICE

1. THIS COURT ORDERS that the time for service of the Notice of Motion and the Motion is hereby abridged and validated so that this motion is properly returnable today and hereby dispenses with further service thereof.

APPOINTMENT

2. THIS COURT ORDERS that pursuant to section 243(1) of the BIA and section 101 of the CJA, Deloitte is hereby appointed Receiver, without security, of all of the assets, undertakings and properties of the Debtor acquired for, or used in relation to a business carried on by the Debtor, including all proceeds thereof (the "**Property**").

RECEIVER'S POWERS

3. THIS COURT ORDERS that the Receiver is hereby empowered and authorized, but not obligated, to act at once in respect of the Property and, without in any way limiting the generality of the foregoing, the Receiver is hereby expressly empowered and authorized, but not obligated, to do any of the following where the Receiver considers it necessary or desirable:

- (a) to take possession of and exercise control over the Property and any and all proceeds, receipts and disbursements arising out of or from the Property;
- (b) to receive, preserve, and protect the Property, or any part or parts thereof, including, but not limited to, the changing of locks and security codes, the relocating of Property to safeguard it, the engaging of independent security personnel, the taking of physical inventories and the placement of such insurance coverage as may be necessary or desirable;
- (c) to manage, operate, and carry on the business of the Debtor, including the powers to enter into any agreements, incur any obligations in the ordinary

course of business, cease to carry on all or any part of the business, or cease to perform any contracts of the Debtor;

- (d) to engage consultants, appraisers, agents, experts, auditors, accountants, managers, counsel and such other persons from time to time and on whatever basis, including on a temporary basis, to assist with the exercise of the Receiver's powers and duties, including without limitation those conferred by this Order;
- (e) to purchase or lease such machinery, equipment, inventories, supplies, premises or other assets to continue the business of the Debtor or any part or parts thereof;
- (f) to receive and collect all monies and accounts now owed or hereafter owing to the Debtor and to exercise all remedies of the Debtor in collecting such monies, including, without limitation, to enforce any security held by the Debtor;
- (g) to settle, extend or compromise any indebtedness owing to the Debtor;
- (h) to execute, assign, issue and endorse documents of whatever nature in respect of any of the Property, whether in the Receiver's name or in the name and on behalf of the Debtor, for any purpose pursuant to this Order;
- (i) to initiate, prosecute and continue the prosecution of any and all proceedings and to defend all proceedings now pending or hereafter instituted with respect to the Debtor, the Property or the Receiver, and to settle or compromise any such proceedings. The authority hereby conveyed shall extend to such appeals or applications for judicial review in respect of any order or judgment pronounced in any such proceeding;
- (j) to market any or all of the Property, including advertising and soliciting offers in respect of the Property or any part or parts thereof and negotiating such terms and conditions of sale as the Receiver in its

discretion may deem appropriate, including in accordance with the processes of disposition as described and proposed in the pre-filing report of Deloitte dated May 19, 2023 filed with the Court on this application (the “**Pre-Filing Report**”);

- (k) to sell, convey, transfer, lease or assign the Property or any part or parts thereof out of the ordinary course of business,
 - (i) without the approval of this Court in respect of any transaction not exceeding \$1,000,000, provided that the aggregate consideration for all such transactions does not exceed \$5,000,000, all before applicable taxes; and
 - (ii) with the approval of this Court in respect of any transaction in which the purchase price or the aggregate purchase price exceeds the applicable amount set out in the preceding clause;

and in each such case notice under subsection 63(4) of the Ontario *Personal Property Security Act* shall not be required, and in each case the Ontario *Bulk Sales Act* shall not apply.

- (l) to apply for any vesting order or other orders necessary to convey the Property or any part or parts thereof to a purchaser or purchasers thereof, free and clear of any liens or encumbrances affecting such Property;
- (m) to report to, meet with and discuss with such affected Persons (as defined below) as the Receiver deems appropriate on all matters relating to the Property and the receivership, and to share information, subject to such terms as to confidentiality as the Receiver deems advisable;
- (n) to register a copy of this Order and any other Orders in respect of the Property against title to any of the Property;

- (o) to apply for any permits, licences, approvals or permissions as may be required by any governmental authority and any renewals thereof for and on behalf of and, if thought desirable by the Receiver, in the name of the Debtor;
- (p) to file an assignment into bankruptcy, and to act as trustee in bankruptcy, on behalf of all or any of the Debtors;
- (q) to enter into agreements with any trustee in bankruptcy appointed in respect of the Debtor, including, without limiting the generality of the foregoing, the ability to enter into occupation agreements for any property owned or leased by the Debtor;
- (r) to exercise any shareholder, partnership, joint venture or other rights which the Debtor may have; and
- (s) to take any steps reasonably incidental to the exercise of these powers or the performance of any statutory obligations.

and in each case where the Receiver takes any such actions or steps, it shall be exclusively authorized and empowered to do so, to the exclusion of all other Persons (as defined below), including the Debtor, and without interference from any other Person.

DUTY TO PROVIDE ACCESS AND CO-OPERATION TO THE RECEIVER

4. THIS COURT ORDERS that (i) the Debtor, (ii) all of its current and former directors, officers, employees, agents, accountants, legal counsel and shareholders, and all other persons acting on its instructions or behalf, and (iii) all other individuals, firms, corporations, governmental bodies or agencies, or other entities having notice of this Order (all of the foregoing, collectively, being "**Persons**" and each being a "**Person**") shall forthwith advise the Receiver of the existence of any Property in such Person's possession or control, shall grant immediate and continued access to the Property to the Receiver, and shall deliver all such Property to the Receiver upon the Receiver's request.

5. THIS COURT ORDERS that all Persons shall forthwith advise the Receiver of the existence of any books, documents, securities, contracts, orders, corporate and accounting records, and any other papers, records and information of any kind related to the business or affairs of the Debtor, and any computer programs, computer tapes, computer disks, or other data storage media containing any such information (the foregoing, collectively, the "**Records**") in that Person's possession or control, and shall provide to the Receiver or permit the Receiver to make, retain and take away copies thereof and grant to the Receiver unfettered access to and use of accounting, computer, software and physical facilities relating thereto, provided however that nothing in this paragraph 5 or in paragraph 6 of this Order shall require the delivery of Records, or the granting of access to Records, which may not be disclosed or provided to the Receiver due to the privilege attaching to solicitor-client communication or due to statutory provisions prohibiting such disclosure.

6. THIS COURT ORDERS that if any Records are stored or otherwise contained on a computer or other electronic system of information storage, whether by independent service provider or otherwise, all Persons in possession or control of such Records shall forthwith give unfettered access to the Receiver for the purpose of allowing the Receiver to recover and fully copy all of the information contained therein whether by way of printing the information onto paper or making copies of computer disks or such other manner of retrieving and copying the information as the Receiver in its discretion deems expedient, and shall not alter, erase or destroy any Records without the prior written consent of the Receiver. Further, for the purposes of this paragraph, all Persons shall provide the Receiver with all such assistance in gaining immediate access to the information in the Records as the Receiver may in its discretion require including providing the Receiver with instructions on the use of any computer or other system and providing the Receiver with any and all access codes, account names and account numbers that may be required to gain access to the information.

7. THIS COURT ORDERS that the Receiver shall provide each of the relevant landlords with notice of the Receiver's intention to remove any fixtures from any leased premises at least seven (7) days prior to the date of the intended removal. The relevant landlord shall be entitled to have a representative present in the leased premises to observe such removal and, if the landlord disputes the Receiver's entitlement to remove any such fixture under the provisions of

the lease, such fixture shall remain on the premises and shall be dealt with as agreed between any applicable secured creditors, such landlord and the Receiver, or by further Order of this Court upon application by the Receiver on at least two (2) days notice to such landlord and any such secured creditors.

NO PROCEEDINGS AGAINST THE RECEIVER

8. THIS COURT ORDERS that no proceeding or enforcement process in any court or tribunal (each, a "**Proceeding**"), shall be commenced or continued against the Receiver except with the written consent of the Receiver or with leave of this Court.

NO PROCEEDINGS AGAINST THE DEBTOR OR THE PROPERTY

9. THIS COURT ORDERS that no Proceeding against or in respect of the Debtor or the Property shall be commenced or continued except with the written consent of the Receiver or with leave of this Court and any and all Proceedings currently under way against or in respect of the Debtor or the Property are hereby stayed and suspended pending further Order of this Court.

NO EXERCISE OF RIGHTS OR REMEDIES

10. THIS COURT ORDERS that all rights and remedies against the Debtor, the Receiver, or affecting the Property, are hereby stayed and suspended except with the written consent of the Receiver or leave of this Court, provided however that this stay and suspension does not apply in respect of any "eligible financial contract" as defined in the BIA, and further provided that nothing in this paragraph shall (i) empower the Receiver or the Debtor to carry on any business which the Debtor is not lawfully entitled to carry on, (ii) exempt the Receiver or the Debtor from compliance with statutory or regulatory provisions relating to health, safety or the environment, (iii) prevent the filing of any registration to preserve or perfect a security interest, or (iv) prevent the registration of a claim for lien.

NO INTERFERENCE WITH THE RECEIVER

11. THIS COURT ORDERS that no Person shall discontinue, fail to honour, alter, interfere with, repudiate, terminate or cease to perform any right, renewal right, contract, agreement,

licence or permit in favour of or held by the Debtor, without written consent of the Receiver or leave of this Court.

CONTINUATION OF SERVICES

12. THIS COURT ORDERS that all Persons having oral or written agreements with the Debtor or statutory or regulatory mandates for the supply of goods and/or services, including without limitation, all computer software, communication and other data services, centralized banking services, payroll services, insurance, transportation services, utility services, leases of equipment or premises, or other services to the Debtor are hereby restrained until further Order of this Court from discontinuing, altering, interfering with or terminating the supply of such goods or services as may be required by the Receiver, and that the Receiver shall be entitled to the continued use of the Debtor's current telephone numbers, facsimile numbers, internet addresses and domain names, provided in each case that the normal prices or charges for all such goods or services received after the date of this Order are paid by the Receiver in accordance with normal payment practices of the Debtor or such other practices as may be agreed upon by the supplier or service provider and the Receiver, or as may be ordered by this Court.

RECEIVER TO HOLD FUNDS

13. THIS COURT ORDERS that all funds, monies, cheques, instruments, and other forms of payments received or collected by the Receiver from and after the making of this Order from any source whatsoever, including without limitation the sale of all or any of the Property and the collection of any accounts receivable in whole or in part, whether in existence on the date of this Order or hereafter coming into existence, shall be deposited into one or more new accounts to be opened by the Receiver (the "**Post Receivership Accounts**") and the monies standing to the credit of such Post Receivership Accounts from time to time, net of any disbursements provided for herein, shall be held by the Receiver to be paid in accordance with the terms of this Order or any further Order of this Court.

EMPLOYEES

14. THIS COURT ORDERS that all employees of the Debtor shall remain the employees of the Debtor until such time as the Receiver, on the Debtor's behalf, may terminate the

employment of such employees. The Receiver shall not be liable for any employee-related liabilities, including any successor employer liabilities as provided for in section 14.06(1.2) of the BIA, other than such amounts as the Receiver may specifically agree in writing to pay, or in respect of its obligations under sections 81.4(5) or 81.6(3) of the BIA or under the *Wage Earner Protection Program Act*.

PIPEDA

15. THIS COURT ORDERS that, pursuant to clause 7(3)(c) of the Canada *Personal Information Protection and Electronic Documents Act*, the Receiver shall disclose personal information of identifiable individuals to prospective purchasers or bidders for the Property and to their advisors, but only to the extent desirable or required to negotiate and attempt to complete one or more sales of the Property (each, a "**Sale**"). Each prospective purchaser or bidder to whom such personal information is disclosed shall maintain and protect the privacy of such information and limit the use of such information to its evaluation of the Sale, and if it does not complete a Sale, shall return all such information to the Receiver, or in the alternative destroy all such information. The purchaser of any Property shall be entitled to continue to use the personal information provided to it, and related to the Property purchased, in a manner which is in all material respects identical to the prior use of such information by the Debtor, and shall return all other personal information to the Receiver, or ensure that all other personal information is destroyed.

LIMITATION ON ENVIRONMENTAL LIABILITIES

16. THIS COURT ORDERS that nothing herein contained shall require the Receiver to occupy or to take control, care, charge, possession or management (separately and/or collectively, "**Possession**") of any of the Property that might be environmentally contaminated, might be a pollutant or a contaminant, or might cause or contribute to a spill, discharge, release or deposit of a substance contrary to any federal, provincial or other law respecting the protection, conservation, enhancement, remediation or rehabilitation of the environment or relating to the disposal of waste or other contamination including, without limitation, the *Canadian Environmental Protection Act*, the *Ontario Environmental Protection Act*, the *Ontario Water Resources Act*, or the *Ontario Occupational Health and Safety Act* and regulations

thereunder (the "**Environmental Legislation**"), provided however that nothing herein shall exempt the Receiver from any duty to report or make disclosure imposed by applicable Environmental Legislation. The Receiver shall not, as a result of this Order or anything done in pursuance of the Receiver's duties and powers under this Order, be deemed to be in Possession of any of the Property within the meaning of any Environmental Legislation, unless it is actually in possession.

LIMITATION ON THE RECEIVER'S LIABILITY

17. THIS COURT ORDERS that the Receiver shall incur no liability or obligation as a result of its appointment or the carrying out the provisions of this Order, save and except for any gross negligence or wilful misconduct on its part, or in respect of its obligations under sections 81.4(5) or 81.6(3) of the BIA or under the *Wage Earner Protection Program Act*. Nothing in this Order shall derogate from the protections afforded the Receiver by section 14.06 of the BIA or by any other applicable legislation.

RECEIVER'S ACCOUNTS

18. THIS COURT ORDERS that the Receiver and counsel to the Receiver shall be paid their reasonable fees and disbursements, in each case at their standard rates and charges unless otherwise ordered by the Court on the passing of accounts, and that the Receiver and counsel to the Receiver shall be entitled to and are hereby granted a charge (the "**Receiver's Charge**") on the Property, as security for such fees and disbursements, both before and after the making of this Order in respect of these proceedings, and that the Receiver's Charge shall form a first charge on the Property in priority to all security interests, trusts, liens, charges and encumbrances, statutory or otherwise, in favour of any Person, but subject to sections 14.06(7), 81.4(4), and 81.6(2) of the BIA.

19. THIS COURT ORDERS that the Receiver and its legal counsel shall pass its accounts from time to time, and for this purpose the accounts of the Receiver and its legal counsel are hereby referred to a judge of the Commercial List of the Ontario Superior Court of Justice.

20. THIS COURT ORDERS that prior to the passing of its accounts, the Receiver shall be at liberty from time to time to apply reasonable amounts, out of the monies in its hands, against its

fees and disbursements, including legal fees and disbursements, incurred at the standard rates and charges of the Receiver or its counsel, and such amounts shall constitute advances against its remuneration and disbursements when and as approved by this Court.

FUNDING OF THE RECEIVERSHIP

21. THIS COURT ORDERS that the Receiver be at liberty and it is hereby empowered to borrow by way of a revolving credit or otherwise, such monies from time to time as it may consider necessary or desirable, provided that the outstanding principal amount does not exceed \$2,000,000 (or such greater amount as this Court may by further Order authorize) at any time, at such rate or rates of interest as it deems advisable for such period or periods of time as it may arrange, for the purpose of funding the exercise of the powers and duties conferred upon the Receiver by this Order, including interim expenditures. The whole of the Property shall be and is hereby charged by way of a fixed and specific charge (the "**Receiver's Borrowings Charge**") as security for the payment of the monies borrowed, together with interest and charges thereon, in priority to all security interests, trusts, liens, charges and encumbrances, statutory or otherwise, in favour of any Person, but subordinate in priority to the Receiver's Charge and the charges as set out in sections 14.06(7), 81.4(4), and 81.6(2) of the BIA.

22. THIS COURT ORDERS that, pending further Order of the Court, for a period of fifteen (15) calendar days following the date of this Order (the "**Interim Comeback Period**"), the Receiver's Borrowing Charge shall not extend to collateral that is subject to a properly perfected security interest that is in priority to the Bank's security, including purchase money security interests. Any secured creditor that wishes to take the position that the priority charges granted pursuant to this Order should not extend to collateral subject to their security interest shall serve a motion on notice to the Receiver and the Bank within fifteen (15) calendar days of the date of this Order, seeking such relief. In the absence of an Order being granted in respect of such motion that is served within the Interim Comeback Period, all priority charges under this Order including the Receiver's Borrowings Charge set forth in paragraph 21 above, will apply to all assets, including those subject to purchase money security interests, equipment leases or other interests that may be in priority to the Bank's security, immediately upon the conclusion of the Interim Comeback Period without any further steps being taken.

23. THIS COURT ORDERS that neither the Receiver's Borrowings Charge nor any other security granted by the Receiver in connection with its borrowings under this Order shall be enforced without leave of this Court.

24. THIS COURT ORDERS that the Receiver is at liberty and authorized to issue certificates substantially in the form annexed as Schedule "A" hereto (the "**Receiver's Certificates**") for any amount borrowed by it pursuant to this Order.

25. THIS COURT ORDERS that the monies from time to time borrowed by the Receiver pursuant to this Order or any further order of this Court and any and all Receiver's Certificates evidencing the same or any part thereof shall rank on a *pari passu* basis, unless otherwise agreed to by the holders of any prior issued Receiver's Certificates.

SERVICE AND NOTICE

26. THIS COURT ORDERS that the E-Service Protocol of the Commercial List (the "**Protocol**") is approved and adopted by reference herein and, in this proceeding, the service of documents made in accordance with the Protocol (which can be found on the Commercial List website at <http://www.ontariocourts.ca/scj/practice/practice-directions/toronto/e-service-protocol/>) shall be valid and effective service. Subject to Rule 17.05 this Order shall constitute an order for substituted service pursuant to Rule 16.04 of the Rules of Civil Procedure. Subject to Rule 3.01(d) of the Rules of Civil Procedure and paragraph 21 of the Protocol, service of documents in accordance with the Protocol will be effective on transmission. This Court further orders that a Case Website shall be established in accordance with the Protocol with the following URL www.insolvencies.deloitte.ca/en-ca/InjectionTechnologies.

27. THIS COURT ORDERS that if the service or distribution of documents in accordance with the Protocol is not practicable, the Receiver is at liberty to serve or distribute this Order, any other materials and orders in these proceedings, any notices or other correspondence, by forwarding true copies thereof by prepaid ordinary mail, courier, personal delivery or facsimile transmission to the Debtor's creditors or other interested parties at their respective addresses as last shown on the records of the Debtor and that any such service or distribution by courier,

personal delivery or facsimile transmission shall be deemed to be received on the next business day following the date of forwarding thereof, or if sent by ordinary mail, on the third business day after mailing.

GENERAL

28. THIS COURT ORDERS that the Receiver may from time to time apply to this Court for advice and directions in the discharge of its powers and duties hereunder.

29. THIS COURT ORDERS that the Receiver may retain solicitors to represent and advise the Receiver in connection with the exercise of the Receiver's powers and duties, including without limitation, those conferred by this Order. Such solicitors may include Aird & Berlis LLP, solicitors for the Applicant herein, in respect of any matter where there is no conflict of interest. The Receiver shall, however, retain independent solicitors in respect of any legal advice or services where a conflict exists, or may arise.

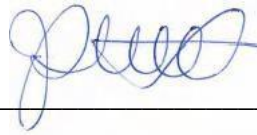
30. THIS COURT ORDERS that nothing in this Order shall prevent the Receiver from acting as a trustee in bankruptcy of the Debtor.

31. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

32. THIS COURT ORDERS that the Receiver be at liberty and is hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Receiver is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

33. THIS COURT ORDERS that the Applicant shall have its costs of this motion, up to and including entry and service of this Order, provided for by the terms of the Applicant's security or, if not so provided by the Applicant's security, then on a substantial indemnity basis to be paid by the Receiver from the Debtor's estate with such priority and at such time as this Court may determine.

34. THIS COURT ORDERS that any interested party may apply to this Court to vary or amend this Order on not less than seven (7) days' notice to the Receiver and to any other party likely to be affected by the order sought or upon such other notice, if any, as this Court may order.



SCHEDULE "A"

RECEIVER CERTIFICATE

CERTIFICATE NO. _____

AMOUNT \$ _____

1. THIS IS TO CERTIFY that Deloitte Restructuring Inc., the receiver (the "Receiver") of the assets, undertakings and properties [DEBTOR'S NAME] acquired for, or used in relation to a business carried on by the Debtor, including all proceeds thereof (collectively, the "Property") appointed by Order of the Ontario Superior Court of Justice (Commercial List) (the "Court") dated the ___ day of _____, 20__ (the "Order") made in an action having Court file number __-CL-_____, has received as such Receiver from the holder of this certificate (the "Lender") the principal sum of \$ _____, being part of the total principal sum of \$ _____ which the Receiver is authorized to borrow under and pursuant to the Order.

2. The principal sum evidenced by this certificate is payable on demand by the Lender with interest thereon calculated and compounded [daily][monthly not in advance on the _____ day of each month] after the date hereof at a notional rate per annum equal to the rate of _____ per cent above the prime commercial lending rate of Bank of _____ from time to time.

3. Such principal sum with interest thereon is, by the terms of the Order, together with the principal sums and interest thereon of all other certificates issued by the Receiver pursuant to the Order or to any further order of the Court, a charge upon the whole of the Property, in priority to the security interests of any other person, but subject to the priority of the charges set out in the Order and in the *Bankruptcy and Insolvency Act*, and the right of the Receiver to indemnify itself out of such Property in respect of its remuneration and expenses.

4. All sums payable in respect of principal and interest under this certificate are payable at the main office of the Lender at Toronto, Ontario.

5. Until all liability in respect of this certificate has been terminated, no certificates creating charges ranking or purporting to rank in priority to this certificate shall be issued by the Receiver to any person other than the holder of this certificate without the prior written consent of the holder of this certificate.

6. The charge securing this certificate shall operate so as to permit the Receiver to deal with the Property as authorized by the Order and as authorized by any further or other order of the Court.

7. The Receiver does not undertake, and it is not under any personal liability, to pay any sum in respect of which it may issue certificates under the terms of the Order.

DATED the ____ day of _____, 20__.

DELOITTE RESTRUCTURING INC., solely in its capacity as Receiver of the Property, and not in its personal capacity

Per: _____

Name:

Title:

THE TORONTO-DOMINION BANK

- and - **INJECTION TECHNOLOGIES INC., MOLDCO
PLASTICS INC., AND MOLDCO HOLDINGS INC.**

Applicant

Respondents

Court File No.

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

Proceedings commenced at Toronto

RECEIVERSHIP ORDER

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52930829.5

APPENDIX "B"

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

**FIRST REPORT OF DELOITTE RESTRUCTURING INC.
IN ITS CAPACITY AS THE RECEIVER AND MANAGER
DATED AUGUST 15, 2023**

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APPENDICES

APPENDIX	DESCRIPTION
A	Pre-Filing Report of the Proposed Receiver dated May 19, 2023
B	Receivership Appointment Order dated May 26, 2023
C	Endorsement of Justice Steele dated May 26, 2023
D	Asset Purchase Agreement between AarKel Testing Technologies Inc. and Deloitte Restructuring Inc. dated July 28, 2023 – Redacted Version
E	Asset Purchase Agreement between Corporate Assets Inc. and Deloitte Restructuring Inc. dated August 4, 2023 – Redacted Version
F	Receiver’s Statement of Receipts and Disbursements

CONFIDENTIAL APPENDICES

CONFIDENTIAL APPENDIX	DESCRIPTION
1	Comparative Summary of Offers from Going Concern Purchasers
2	Comparative Summary of Auction Proposals
3	Asset Purchase Agreement between AarKel Testing Technologies Inc. and Deloitte Restructuring Inc. dated July 28, 2023 – Unredacted Version
4	Asset Purchase Agreement between Corporate Assets Inc. and Deloitte Restructuring Inc. dated August 4, 2023 – Unredacted Version

INTRODUCTION

1. The Toronto-Dominion Bank (“**TD**” or the “**Bank**”) brought an application returnable May 26, 2023 before the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) for an order appointing Deloitte Restructuring Inc. (“**Deloitte**”) as receiver and manager (the “**Receiver**”), pursuant to section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), and section 101 of the *Courts of Justice Act* R.S.O. 1990 c. C.43, as amended, of the assets, undertakings and properties (collectively, the “**Property**”) of Injection Technologies Inc. (“**ITI**”), Moldco Plastics Inc. (“**MPI**”), and Moldco Holdings Inc. (“**Moldco Holdings**”, and together with ITI and MPI, the “**Debtors**”) acquired for, or used in relation to a business carried on by the Debtors.
2. ITI and MPI operated as injection molded plastic parts manufacturers from two facilities located in Windsor and Kitchener. Moldco Holdings is the owner of certain equipment used in the operations in Kitchener. Historically, production focused on automotive customers and later expanded into consumer and medical instrument products made in the Kitchener location.
3. The Windsor operations also include a longstanding tryouts/trials (“**Tryouts**”) business from which customers use equipment and personnel at the Windsor Facility (defined below) to test molds prior to the completion of molds and release for mass production of parts.
4. TD is the senior secured lender to the Debtors pursuant to credit, loan, and equipment lease agreements (the “**TD Loan Agreements**”) granted by TD (the “**TD Indebtedness**”) and was owed in excess of Cdn \$13.0 million and US \$1.9 million as at May 1, 2023. This amount excludes all legal costs, disbursements, and accrued interest.
5. In February 2023, Deloitte was retained as financial advisor to TD to, among other things, review the Debtors’ current operations, financial position, and business viability.
6. On May 19, 2023, Deloitte issued its pre-filing report (the “**Pre-Filing Report**”) in its capacity as the proposed receiver (the “**Proposed Receiver**”) for the purpose of, among other things, (i) providing information in respect of the Debtors’ financial affairs, creditors and Property, and (ii) summarizing the Proposed Receiver’s suggested marketing process for the sale of the Debtors’ assets and operations (the “**Sale Process**”). A copy of the Pre-Filing Report is attached hereto as **Appendix “A”**.
7. On May 26, 2023, the Court issued an order (the “**Receivership Order**”) appointing Deloitte as the Receiver of the Property. Copies of the Receivership Order and the Endorsement of Justice Steele are attached hereto as **Appendix “B”** and **Appendix “C”**, respectively.

8. Copies of the Receivership Order, together with other Court documents, Receiver's reports and stakeholder notices with respect to this matter are available on the Receiver's website at www.insolvencies.deloitte.ca/en-ca/InjectionTechnologies.
9. Section 3(j) of the Receivership Order authorized the Receiver to market by way of the Sale Process any or all of the Property, including advertising and soliciting offers in respect of the Property or any part or parts thereof and negotiating such terms and conditions of sale as the Receiver in its discretion may deem appropriate, including in accordance with the processes of disposition as described and proposed in the Pre-Filing Report.
10. Further, section 3(k)(i) of the Receivership Order authorized the Receiver to sell, convey, transfer, lease or assign the Property or parts of the Property out of the ordinary course of business, without the approval of this Court in respect of any transaction not exceeding \$1,000,000, provided that the aggregate consideration for all such transactions does not exceed \$5,000,000, all before applicable taxes.
11. This first report of the Receiver (the "**First Report**") is filed in connection with the Receiver's motion to, among other things:
 - (a) provide the Court with additional information in respect of the Debtors and the Property;
 - (b) provide the Court with an evidentiary basis to make Orders:
 - (i) approving this First Report¹ and the activities of the Receiver, including steps taken in dealing with the Property, as described in this First Report, including, without limitation, the steps taken by the Receiver relating to the Sale Process (as defined below), collection of accounts receivable, realizations derived from continued production and Tryouts revenue, employee matters, and communications with equipment lessors and landlords;
 - (ii) approving the sale transaction (the "**AarKel Transaction**") to be effected through an asset purchase agreement dated and executed on July 28, 2023 (the "**AarKel APA**") between the Receiver and AarKel Testing Technologies Inc. ("**AarKel**"), a newly incorporated subsidiary of Zynik Manufacturing Group, together with any further amendments thereto deemed necessary by the Receiver in its sole opinion, for the sale of certain of the Property located at the Debtors' premises in Windsor, Ontario (the "**Windsor Property**") as described in the AarKel APA and the

¹ Noting that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way any approval of the First Report, if granted by the Court

schedules thereto, and vesting the Debtors' right, title and interest in the Windsor Property, and authorizing and directing the Receiver to carry out the terms of the AarKel APA;

- (iii) authorizing and directing the Receiver to enter into and carry out the terms of the Auction Services Agreement between the Receiver and Corporate Assets Inc. (the "**Auctioneer**") dated August 4, 2023 (the "**Auction Agreement**"), together with any further amendments thereto deemed necessary by the Receiver in its sole discretion, and vesting the right, title and interest of the Receiver and the Debtors in and to certain of the Property listed in Schedule A to the Auction Agreement comprising substantially all of the machinery and equipment located at the Debtors' premises at the Kitchener Plant (defined below) and certain residual assets located at the Windsor Plant (defined below) (the "**Auctioneer Purchased Assets**"), in and to the Auctioneer upon closing of the sale transaction under the Auction Agreement (the "**Auction Transaction**");
- (iv) authorizing and directing the Receiver to enter into negotiations to sell the Property to any other party identified through the Sale Process or otherwise if the AarKel APA and/or the Auction Agreement are terminated;
- (v) temporarily sealing from the public record, pending further order of the Court, (i) the Summary of Offers (as defined herein), attached as **Confidential Appendix "1"**; (ii) the Summary of Auction Proposals (as defined herein), attached as **Confidential Appendix "2"**, (iii) the unredacted version of the AarKel APA as **Confidential Appendix "3"**, and (iv) the unredacted version of the Auction Agreement, attached as **Confidential Appendix "4"**; and
- (vi) approving the Receiver's Statement of Receipts and Disbursements for the period May 26, 2023 to July 31, 2023.

TERMS OF REFERENCE

12. In preparing this First Report, the Receiver has been provided with, and has relied upon, unaudited, draft and/or internal financial information, the Debtors' books and records, and discussions with management of the Debtors ("**Management**") (collectively, the "**Information**"). Except as described in this First Report:

- (a) Deloitte has reviewed the Information for reasonableness, internal consistency and use in the context in which it was provided. However, Deloitte has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards (“CAS”) pursuant to the Chartered Professional Accountants Canada Handbook, and, accordingly, Deloitte expresses no opinion or other form of assurance contemplated under CAS in respect of the Information; and
 - (b) Deloitte has prepared this First Report in its capacity as the Receiver in connection with the relief sought by the Receiver described herein. Parties using this First Report other than for the purposes outlined herein are cautioned that it may not be appropriate for their purposes.
13. Unless otherwise stated, all dollar amounts contained in the Report are expressed in Canadian dollars.

BACKGROUND

14. ITI is a Windsor-based injection molded plastic parts manufacturer and customer tryouts/trials facility that has been in operation since 1990. Historically, ITI specialized in mold try-outs and service business, and later expanded its short batch and extended run production following the acquisition of MPI in March 2020.
15. Historically, ITI operated solely from premises located at 4350 Industrial Drive, Windsor, Ontario (the “**Windsor Facility**”) which it owned until completing a sale-leaseback transaction in March 2022. The Windsor Facility is now subject to a long-term lease with 2856808 Ontario Inc., and MPI is a guarantor under that lease.
16. More recently, ITI also operated from the Kitchener Facility (defined below).
17. ITI maintains a warehouse at 2051 Ambassador Drive, Windsor, Ontario (the “**Windsor Warehouse**”) pursuant to a lease with 1088168 Ontario Ltd. The Windsor Warehouse is primarily used for storing raw materials and finished goods inventory, and has two presses for limited production, as necessary.
18. Pursuant to a share purchase agreement dated February 29, 2020 (the “**MPI Purchase Agreement**”), 1241704 BC Ltd. (“**124 BC**”) purchased the shares of Molco Inc. and 2426496 Ontario Inc. (“**242 Ontario**”) from the 2013 Gary Paul Cluthe Family Trust (the “**Cluthe Family Trust**”) for cash consideration plus a vendor take-back promissory note (the “**Cluthe VTB**”). The

Receiver's counsel is in correspondence with counsel to the Cluthe Family Trust and is reviewing the Cluthe Family Trusts claim.

19. Subsequently, Moldco Inc. changed its name to "Moldco Plastics Inc." and 242 Ontario changed its name to "Moldco Holdings Inc.". In addition to ITI and MPI, the Debtors also operate under the trade name banners of Inject Tech Plastics, MoldCo Inc., and IT Group.
20. Prior to this receivership proceeding, MPI was a Kitchener-based injection molded plastic parts manufacturer specializing in small batch and extended run production along with sub-assembly of molded components. Historically, MPI operated from leased premises located at 965 Wilson Ave., Kitchener, Ontario (the "**Old Kitchener Premises**") pursuant to a lease with Taylor Made Holdings Limited.
21. In October 2020, ITI entered into a lease agreement in respect of a large facility located at 41 Ardel Place, Kitchener, Ontario (the "**Kitchener Facility**"). 41 Ardel Management Group Limited is the current landlord in respect of the Kitchener Facility. MPI moved into the Kitchener Facility and subleased the Old Kitchener Premises to a major customer which remains active.
22. Both Tryouts and parts production operations at the Windsor Facility continued without any significant interruption since the date of the Receivership Order. There are approximately 67 employees based in Windsor at this time.
23. As detailed later in this First Report, operations at the Kitchener Facility were temporarily suspended until the Receiver developed a commercially reasonable and limited parts production schedule. There are approximately 38 employees currently working at the Kitchener Facility until the Receiver completes the wind-down of production and final shipments as described in more detail later in this First Report.
24. None of the employees are represented by a union and the Debtors do not sponsor a pension plan.
25. Management advised that Moldco Holdings owns certain fixed assets located in Kitchener, but had no operations, employees, or other assets except the shares of the operating companies.
26. Paragraphs 24 to 32 of the Pre-Filing Report set out additional details in respect of the Debtors' corporate structure and their principals.

RECEIVER'S ACTIVITIES

27. The Receiver has undertaken the following activities in accordance with the terms of the Receivership Order:

- (a) attended at the Windsor Facility, Windsor Warehouse, and the Kitchener Facility and took possession of the Property located at those locations;
- (b) arranged for a change of locks, engaged third-party security services, and made arrangements for the continuation of utilities at the Windsor Facility, Windsor Warehouse, and Kitchener Facility;
- (c) met with members of Management and all employees at each facility to advise them of the Receivership Order and the Receiver's mandate;
- (d) issued receivership notification letters to each of the four landlords;
- (e) corresponded with the landlords of the four leased premises regarding, among other things, occupation rent and the required occupancy period pursuant to the AarKel APA and the Auction Agreement;
- (f) determined that the temporary continuation of operations by the Receiver in (i) Windsor was an economically viable option, and (ii) in Kitchener was only economically viable on a reduced and customer-targeted basis to maximize any potential going concern value and to assist with other customer order realizations;
- (g) on behalf of the Debtors, terminated the employment of all employees of the Debtors effective as of the date of the Receivership Order, and made arrangements to deliver termination letters to other employees who were not onsite;
- (h) temporarily retained all of the active employees of the Debtors located at the Windsor Facility, the Windsor Warehouse, and certain employees at the Kitchener Facility to, among other things, continue operations to preserve going concern value as the Receiver conducted the Sale Process and to maximize realizations of accounts receivable and inventory, updating the books of the Debtors where possible, and administering amounts due to employees under the *Wage Earner Protection Program Act* (“WEPPA”);
- (i) coordinated the delivery of Records of Employment, expedited the issuance of WEPPA letter packages to the employees, and conducting on-site staff meetings led by the Receiver and human resources personnel to assist employees with filing their applications;
- (j) provided access to employees who were not retained by the Receiver to retrieve their personal belongings;

- (k) provided notice of the Receiver's appointment to the existing insurance broker, NFP Canada ("**NFP**"), to confirm ongoing coverage until those policies expired on June 8, 2023 (the "**June 8th Policy**") in respect of a portion of assets and operations in Kitchener and June 30, 2023 (the "**June 30th Policy**") in respect of the assets and operations in Windsor and most of the Kitchener Facility. NFP arranged for (i) a renewal of the June 8th Policy and (ii) a temporary extension of the June 30th Policy to September 5, 2023 and is actively seeking a further extension and alternate options to facilitate continued operations at the Windsor Facility and Windsor Warehouse until closing of the AarKel Transaction, and continued coverage during the auction at the Kitchener Facility;
- (l) implemented the Sale Process in substantially the manner described in the Pre-Filing Report, including correspondence and meetings with interested parties, reviewing bids, and negotiating the terms of an asset purchase agreement and an auction services agreement for the balance of the assets;
- (m) ensured that the Debtors' bank accounts were frozen and that only deposits were accepted, except as otherwise directed by the Receiver;
- (n) restricted access from non-authorized external users to computer systems and servers;
- (o) arranged for back-up of the Debtors' servers, which contain financial and other information;
- (p) notified Canada Revenue Agency ("**CRA**") of the appointment of the Receiver, establishing new payroll and harmonized sales tax ("**HST**") accounts for the post-receivership period, and making requests for audits of the pre-receivership accounts of the Debtors;
- (q) undertook efforts to collect and settle the Debtors' outstanding accounts receivable and other receivables, including comprehensive settlements which resulted in the coordinated release of finished goods and raw materials inventory, tools and molds ("**Tools**"), and Tools design data to customers;
- (r) compiled financial and operational information and equipment listings to facilitate the Sale Process;
- (s) established the Receiver's website and issuing the Notice and Statement of Receiver pursuant to subsections 245(1) and 246(1) of the BIA;
- (t) reviewed and responded to inquiries from creditors;

- (u) retained Aird & Berlis LLP as the Receiver's primary legal counsel and Harrison Pensa LLP as its independent legal counsel;
- (v) provided status updates on the progress of the receivership to TD; and
- (w) addressed additional matters as they arose from time to time.

CONTINUED OPERATIONS AND PRODUCTION

Overview

28. Paragraphs 23 and 51 of the Pre-Filing Report set out certain of the difficulties the Debtors' business encountered leading to the Receivership Order.
29. Paragraph 50 of the Pre-Filing Report set out the Receiver's plan to temporarily continue the Tryouts business in the Windsor Facility subject to negotiating payment terms with customers.
30. Paragraph 51 of the Pre-Filing Report set out challenges in respect of the operations at the Kitchener Facility and the Receiver's plan to evaluate the commercial reasonableness of continuing production.
31. Prior to these receivership proceedings, plastic-molded parts for the Debtors' largest customer were produced at both the Windsor Facility and the Kitchener Facility. There were several customers with large accounts receivable balances and inventory on-hand which were at risk of disputes for potential material set-off. The Receiver analyzed the estimated contribution margins of active purchase orders, held meetings with local Management and key operations personnel, and contacted resin suppliers who initially refused to continue supply due to arrears.
32. The Receiver determined that continued Tryouts and limited production during the Sale Process would be beneficial for accounts receivable and inventory realizations, and for expanding the potential buyer universe to parties interested in a going concern transaction. Moreover, several customers agreed to shortened payment terms and to settle outstanding accounts receivable balances and purchase inventory at full value provided that, among other things, the Receiver was able to facilitate the completion of short-run production orders to mitigate immediate disruptions and/or build an inventory bank until such customers could establish alternate supplier arrangements. Accordingly, the Receiver was able to continue operations while funding ongoing payroll and other obligations without requiring borrowings as authorized by the Receivership Order.

Windsor Tryouts and Parts Production

33. The Receiver negotiated continued Tryouts services with existing customers subject to continued payment of pre-receivership amounts owing to the Debtors.
34. Payroll for skilled and technical employees is the primary cost input for the Tryouts business.
35. Resin used in Tryouts is supplied by the tooling customer and/or end customer, such that the Receiver did not purchase resin for Tryouts.
36. Windsor parts production is primarily conducted at the Windsor Facility and is supplemented by two presses at the Windsor Warehouse. The Receiver continued parts production for customers with active purchase orders and who agreed to the Receiver's terms. The most significant production input costs consist of (i) payroll (paid on a weekly basis), and (ii) raw materials, which were primarily on cash on order payment terms.
37. At the Windsor Facility, the Receiver maintained the Debtors' prior schedule consisting of two daily shifts (16-hour coverage) from Monday to Friday. Tryouts are typically conducted during the first daily shift, and production is maintained during both daily shifts.
38. The Receiver intends to continue Tryouts until closing of the AarKel Transaction.
39. The Receiver has provided notice to Windsor production customers that the Receiver intends to suspend production on or before September 1, 2023. The Receiver is working with AarKel to confirm its intentions and plans in respect of production customers.

Kitchener Parts Production

40. Management informed the Receiver that there were hundreds of customer Tools located at the Kitchener Facility.
41. Immediately upon its appointment, the Receiver initially suspended all production at the Kitchener Facility for a few days and gradually increased production into mid-June until a production plan was formalized and arrangements were made with employees, customers, and suppliers. The Receiver has prioritized production for economically viable purchase orders and select parts only, including for certain large customers with significant accounts receivable and inventory balances.
42. Prior to the date of the Receivership Order, the Debtors operated three shifts with 24-hour coverage from Monday to Friday. The Receiver reduced the production schedule to two (2) daily shifts (16-hour coverage) from Monday to Friday.

43. As described later in this First Report, the assets at the Kitchener Facility will be auctioned. The Receiver has notified active customers and employees that production at the Kitchener Facility will be suspended on or before August 18, 2023. The Receiver has established a wind-down program and will be steadily reducing employee headcount by the end of September 2023.
44. Due to the voluminous number of Tools, including obsolete tools not used by customers or the Debtors for many years, the Receiver instructed the limited tooling personnel to undertake a program to tag and prepare Tools for future release. The Receiver has also deployed certain Windsor employees with tooling experience to assist at the Kitchener Facility.
45. The Receiver will continue to coordinate the release of Tools on a scheduled basis, and subject to staff availability and physical access limitations at the Kitchener Facility. The Receiver anticipates that all releases will be completed in the month of September 2023.

CREDITORS

Secured Creditors

46. Paragraph 41 of the Pre-Filing Report set out certain secured creditors based on the Receiver's preliminary review of *Personal Property Security Act* (Ontario) (the "PPSA") registrations and the Debtors' books and records:
 - (a) TD is the senior secured lender and is owed in excess of \$13.0 million and US \$1.9 million as at May 1, 2023, all before legal costs, applicable disbursements, and accrued interest. This consists of a line of credit, term loans, and equipment leases;
 - (b) Bank of Montreal ("BMO") is a secured creditor pursuant to a lease for a large Krauss Maffei injection molding machine (the "BMO Unit") at the Windsor Facility, and is owed approximately \$1.1 million plus interest and costs as at the date of this First Report;
 - (c) De Lage Landen is a secured creditor pursuant to operating leases for forklifts located in Windsor and Kitchener;
 - (d) BMW Group Financial Services Canada is a secured creditor pursuant to a vehicle lease;
 - (e) Meridian OneCap Credit Corp. is a secured creditor with respect to certain equipment; and

- (f) The Receiver's counsel is reviewing the claim made by The Cluthe Family Trust in connection with the Cluthe VTB, to determine if this claim is valid.

Independent Legal Opinion on Security Interests

- 47. Harrison Pensa, in its capacity as independent legal counsel to the Receiver, conducted a review of the security pledged by the Debtors in favour of TD (the "TD Security") and in favour of BMO in the BMO Unit.
- 48. Harrison Pensa has confirmed, subject to normal assumptions and qualifications that:
 - (a) the TD Security creates, under Ontario Law, a valid security interest in favour of TD in the property described in the TD Security (which includes certain leased assets and all of the property, assets and undertakings, and interest in the property of the Debtors) and the security interests created by the TD Security in the personal property described in the TD Security to which the Personal Property Security Act (Ontario) ("PPSA") applies have been perfected by registration under the provisions of the PPSA;
 - (b) BMO's security interest in the BMO Unit creates, under Ontario Law, a valid security interest in favour of BMO in the BMO unit and BMO's security interest in the BMO Unit is a valid and senior claim in the BMO Unit that has been perfected by registration under the provisions of the PPSA; and,
 - (c) the only other registrations under the PPSA are registrations relating to specific assets by:
 - (i) De Lage Landen Financial Services Canada Inc.;
 - (ii) Meridian Onecap Credit Corp;
 - (iii) CWB National Leasing Inc.;
 - (iv) BMW Canada Inc.; and
 - (v) Chilliers Inc.
- 49. Wells Fargo Equipment Finance Company does hold a PPSA registration against ITI, and the Receiver has confirmed that ITI is no longer indebted to Wells Fargo.

50. The Receiver continues to review the claim of the Cluthe Family Trust, noting that at the date of this first Report, the Cluthe Family Trust does not hold a PPSA registration against ITI, MPI nor Moldco Holdings.
51. TD Bank is the sole secured creditor of MPI and Moldco Holdings under the PPSA.

HST

52. Paragraph 44 of the Pre-Filing Report disclosed an unremitted HST liability of ITI in the amount of approximately \$695,000 as at January 31, 2023.
53. The Receiver requested post-receivership HST accounts to be opened and will be filing corresponding returns in due course.

Employee Source Deductions

54. Paragraph 45 of the Pre-Filing Report set out \$1.3 million of unremitted payroll source deductions according to CRA. ITI accumulated a large balance of unremitted payroll source deductions when ITI manually processed payroll internally before transitioning to an external payroll services provider in October 2021 for ongoing remittances. Management advises that the actual obligation is approximately \$488,000 as Management remitted and provided evidence to the Receiver that \$859,000 of ITI payments on account of payroll tax arrears were inadvertently applied by CRA to MPI's payroll tax number. Management and its external accountant were unsuccessful in completely addressing this matter with CRA prior to the date of the Receivership Order.
55. The Receiver has delivered information to CRA in connection with this matter and made repeated requests in this regard. The Receiver will follow up with CRA in respect of the status of its examination of the payroll accounts.
56. The Receiver has made repeated requests to CRA to establish a separate ITI branch payroll account in respect of employees temporarily retained for the receivership. The Receiver has been remitting post-receivership payroll source deductions directly to CRA and will arrange a final payroll trust examination in due course.

WEPPA and BIA Section 81.4 Priority Claims

57. The Receiver arranged for the funding of the Debtors' final normal course payroll due in early June 2023 which included accrued wages, salary, and payroll taxes for the immediate period prior to the

date of the Receivership Order in the total amounts of \$77,635 for Windsor and \$62,934 for Kitchener.

58. As set out earlier in this First Report, the Receiver expedited the performance of WEPPA obligations and mailing of WEPPA packages to eligible employees. The Receiver has since communicated with Service Canada and responded to employee inquiries in respect of same.
59. The Receiver’s submission to Service Canada set out a total amount of approximately \$376,000 in respect of calculated termination pay, severance pay, and vacation pay due to the former employees of the Debtors under WEPPA, of which approximately \$72,000 may be subject to a limited super priority pursuant to Section 81.4 of the BIA.

THE SALE PROCESS

Overview

60. The Receiver administered the Sale Process in a manner and timing substantially consistent with Appendix “A” to the Pre-Filing Report. Reference is made to paragraphs 55 to 59 of the Pre-Filing Report which summarized the proposed Sale Process, timeline, general lot structure, and additional terms and conditions.
61. The Sale Process was a robust process which broadly marketed the assets and business of the Debtors in a reasonable condensed timeframe which reflected (i) the immediate need for any going concern purchaser to urgently retain the employees and engage with customers and key suppliers, and (ii) the lack of liquidity to fund ongoing protective disbursements, including ongoing payroll and interim occupancy costs with multiple leased locations.
62. A chronology of the key activities undertaken by the Receiver in respect of the Sale Process is as follows:

Timing	Activity
May 26, 2023 to June 1, 2023	<ul style="list-style-type: none"> • Identified and prepared of a list of potential purchasers (each, a “Potential Purchaser”). • Prepared a marketing document (the “Teaser”) describing the opportunity and form of non-disclosure agreement (“NDA”) for circulation to Potential Purchasers. • Compiled and reviewed information that would likely be required by Potential Purchasers to assess their offer(s) for the assets.

Timing	Activity
	<ul style="list-style-type: none"> • Responded to in-bound calls and inquiries. • Established and commenced populating the secure electronic data room (the “Data Room”) with financial and operational information.
June 2, 2023	<ul style="list-style-type: none"> • Launched the market outreach campaign with an initial email distribution of the Teaser and NDA to Potential Purchasers.
June 7, 2023	<ul style="list-style-type: none"> • The Data Room was made available for access by Potential Purchasers that had signed an NDA.
June 8, 2023 to July 11, 2023	<ul style="list-style-type: none"> • Arranged third-party inspection of assets and preparation of equipment listings for use by Potential Purchasers. Coordinated site visits at the Windsor Facility, Kitchener Facility, and the Windsor Warehouse, including meetings with the Receiver and local management. • Advertised in industry publications such as Manufacturing Automation (https://www.automationmag.com/) and Canadian Metalworking (https://www.canadianmetalworking.com/). • The Receiver made available a Sale Process timeline in the Data Room and provided bid instructions to Potential Purchasers for both going concern purchasers / operators and auctioneer bids. • Posted the following bid documentation in the Data Room: <ul style="list-style-type: none"> ○ Detailed lot listings and descriptions (each, a “Lot Listing”) for assets located at the Windsor Facility (including a standalone subplot for the BMO Unit and auxiliary equipment), the Windsor Warehouse, the Kitchener Facility. ○ Template bid forms (“Bid Form”) for (i) operators and going concern purchasers, setting out, among other things, the purchase price and deposit amounts, and (ii) auctioneers setting out cash purchase price, net minimum guarantee (“NMG”) price and proposed sharing structure, estimated value range, and deposit amount. ○ Template form of asset purchase agreement for going concern operators. • Responded to inquiries and made additional information available in the Data Room.
July 11, 2023	<ul style="list-style-type: none"> • Bid deadline for submission of bids, including conditions, supplemental bidder information about its operational background, experience, corporate disclosures, and financial capability (the “Bid Deadline”).
July 11, 2023 to July 17, 2023	<ul style="list-style-type: none"> • Review of bids (each, a “Bid”), selection of shortlisted Bids (each, a “Shortlisted Bid”), correspondence and clarifying questions with parties who submitted Shortlisted Bids (each, a “Shortlisted Bidder”), and consultations with stakeholders. • Rejection of certain offers and return of deposits related thereto. • Rejection of offers from the Shortlisted Bidders and request for resubmitted offers using the Receiver’s forms of bid documentation.

Timing	Activity
July 18, 2023	<ul style="list-style-type: none"> • Deadline for resubmission of offers by the Shortlisted Bidders (the “Amended Bid Deadline”)
July 18, 2023 to July 27, 2023	<ul style="list-style-type: none"> • Review and selection of the most advantageous amended bids (the “Amended Bids”) and negotiations with the two respective successful Purchasers (i.e., AarKel and Corporate Assets), conditional on Court approval.
July 28, 2023	<ul style="list-style-type: none"> • Execution of the AarKel APA and commenced transition planning activities with respect to the Windsor Property, including seeking consents from BMO and the landlords of the Windsor Facility and Windsor Warehouse.
August 4, 2023	<ul style="list-style-type: none"> • Execution of the Auction Agreement and commenced pre-marketing activities by the Auctioneer.
August 25, 2023 (future date)	<ul style="list-style-type: none"> • Scheduled Court hearing (the “Sale Approval Hearing”) seeking, among other things, approval of the AarKel APA and the Auction Agreement.
September 5, 2023 (future date)	<ul style="list-style-type: none"> • Target closing date for the AarKel APA with respect to the Windsor Property, subject to satisfaction of conditions including Court Approval
Late September 2023 (future date)	<ul style="list-style-type: none"> • Estimated date for the auction to be conducted pursuant to the Auction Agreement.
Early October 2023 to mid-December 2023 (future period)	<ul style="list-style-type: none"> • Rigging and removal of equipment from the Kitchener Facility and Windsor Facility. • Vacating and concluding the Receiver’s occupancy at the Kitchener Facility.

63. In total, 97 parties were provided with the Teaser, including strategic industry participants, private equity firms, and auctioneers. Of those 97 parties, 38 executed an NDA and were granted access to the Data Room. Of those 38 parties, 15 conducted site visits and tours of the Debtors premises in Windsor and Kitchener. Of those 15 parties, 15 parties (7 going concern purchasers and 8 auctioneers) submitted offers by the Bid Deadline (the “**Bidders**”).

64. A summary of the 7 Bids received from going concern purchasers (the “**Summary of Offers**”) is attached hereto as **Confidential Appendix “1”**.

65. A summary of the 8 Bids received from auctioneers (the “**Summary of Auction Proposals**”) is attached hereto as **Confidential Appendix “2”**.

66. The Receiver reviewed the financial and qualitative aspects of the 15 Bids, including supplemental information thereto, held consultations with stakeholders, and segregated the Bids as follows:

- (a) Six Shortlisted Bids from four going concern purchasers and two auctioneers were identified as the most advantageous offers;
 - (b) The remaining nine offers which were determined to be less advantageous were rejected and deposits were returned to these offerors;
 - (c) The Receiver deemed it appropriate to seek additional clarifying information from the Shortlisted Bidders which ultimately did not resolve all of the Receiver's questions;
 - (d) The Receiver informed the Shortlisted Bidders that their offers could not be accepted in their current form, and requested the resubmission of offers using the Receiver's template documentation due by the Amended Bid Deadline of July 18, 2023; and
 - (e) All six Shortlisted Bidders submitted Amended Bids which are also summarized in the Summary of Offers and Summary of Auction Proposals described above.
67. There was significant interest in the Windsor Property from both operators and auctioneers. In the Receiver's view, no commercially reasonable offers were received from going concern operators for the business and operations conducted at the Kitchener Facility. Auctioneers submitted offers for the standalone and *en bloc* auctions for the assets located in both Windsor and Kitchener.
68. The Receiver conducted a detailed review of the offers and further consulted with TD, and ultimately selected (i) AarKel as the successful Purchaser for the going concern sale of the Windsor business and assets, and (ii) Corporate Assets as the successful purchaser for the auction of the Kitchener assets and certain residual assets in Windsor.
69. The AarKel APA is conditional on Court approval, the consent of BMO in respect of the sale of the BMO Unit, and consents to lease assignments from the landlords of the Windsor Facility and Windsor Warehouse.
70. The Auction Agreement is conditional on Court approval.
71. The Receiver rejected the remaining Amended Bids and returned deposits to the respective Bidders.

ANALYSIS OF THE AAR KEL APA

Terms of Successful Bid re Windsor

72. A redacted copy the AarKel APA is attached hereto as **Appendix “D”**, and the unredacted copy is attached as **Confidential Appendix “3”**.

73. A summary of the non-commercially sensitive key terms of the AarKel APA is provided below.

Summary of the Asset Purchase Agreement	
Purchaser	<ul style="list-style-type: none"> • AarKel Testing Technologies Inc.
Transaction Type	<ul style="list-style-type: none"> • Sale of assets • Form of Approval and Vesting Order appended to the AarKel APA
APA Date	<ul style="list-style-type: none"> • July 28, 2023
Purchase Price	<ul style="list-style-type: none"> • Confidential
Deposit Received	<ul style="list-style-type: none"> • Confidential
Outside Closing Date	<ul style="list-style-type: none"> • August 31, 2023 in order to satisfy the conditions to closing in favour of the Purchaser, or up to an additional 30 days if extended by the Receiver
Purchased Assets	<ul style="list-style-type: none"> • Machinery and equipment and other assets located at the Windsor Facility as particularized in Exhibits G and H to the AarKel APA: (i) Lot 1(a), excluding certain residual assets to be sold under the Auction Agreement, and (ii) Lot 1(b) re the BMO Unit • Machinery and equipment and other assets located at the Windsor Warehouse particularized Lot 3 in Exhibit J to the AarKel APA • Intellectual property used exclusively for the Windsor business
Employees	<ul style="list-style-type: none"> • Purchaser intends to continue Tryouts operations and certain parts production after the closing date. The AarKel APA contemplates AarKel making an offer of employment to employees it elects to hire on terms substantially similar to those existing as of the closing date.
Landlords	<ul style="list-style-type: none"> • The assignment of each of the real property leases for the Windsor Facility and Windsor Warehouse are a condition to closing in favour of the Purchaser

Excluded Assets	<ul style="list-style-type: none">• Any lots other than the Windsor Property, including certain residual equipment located at the Windsor Facility which will form part of the purchased assets pursuant to the Auction Agreement• Cash and cash equivalents• Accounts receivables• Inventory• Tax rebates, grants, refunds, or other amounts recoverable• Amounts due from related parties and shareholders• Amounts recoverable from potential transactions at undervalue, preferences, or other settlements• Corporate records, minute books, tax records and returns, and records having to do with the corporate organization of the Debtors• Information not specifically related to or used in connection with the business
Conditions to Closing	<ul style="list-style-type: none">• Approval and Vesting Order issued by the Court• Purchaser's payment of the balance of the Purchase Price to the Receiver• Consents to the assignment of real property leases from the landlords of the Windsor Facility and Windsor Warehouse• Delivery of title to the BMO Unit to the Purchaser, free and clear of any encumbrances, and BMO's consent to the price allocated to the BMO Unit pursuant to the AarKel APA• Filing of the Receiver's Certificate in the form substantially similar to the Approval and Vesting Order

The Receiver's Observations

74. The Receiver makes the following observations with respect to the AarKel Transaction for consideration by the Court:
- (a) the Sale Process was authorized by the Court pursuant to section 3(j) of the Receivership Order;
 - (b) the Receiver has conducted a fair, transparent, and commercially reasonable sale process which effectively canvassed the market, generated significant interest and exposure with the Potential Purchasers, and resulted in the receipt of multiple bids supported by deposits;
 - (c) no party is objecting to the conclusion of the AarKel Transaction;

- (d) the Purchaser and its private equity sponsor have satisfied the Receiver of their ability to close the AarKel Transaction, and have also disclosed operational qualifications;
- (e) the Purchaser's senior management are active industry participants and are familiar with the Windsor Property and business as a long-standing Tryouts customer of ITI;
- (f) the Receiver believes the AarKel Transaction represents commercially reasonable value;
- (g) the AarKel APA represents the most advantageous offer for the Windsor Property and maximizes recoveries;
- (h) among other things, the consummation of the AarKel Transaction contemplates:
 - (i) continued Tryouts services to customers based in Windsor and Southwestern Ontario;
 - (ii) potential continuation of parts production which is currently being evaluated by AarKel; and
 - (iii) the preservation of employment of Tryouts staff and potentially parts production staff and Management personnel;
- (i) BMO has consented to the price allocated by AarKel in respect of the BMO Unit; and
- (j) TD, which will suffer a significant loss on its secured loans to the Debtors, has advised the Receiver that it supports the AarKel Transaction.

75. Accordingly, the Receiver recommends that the Court approve the AarKel Transaction, noting that the Receiver continues to work with the landlords of the Windsor Facility and Windsor Warehouse to meet the condition relating to same under the AarKel Transaction.

ANALYSIS OF THE AUCTION AGREEMENT

Terms of Successful Bid re Kitchener

76. A redacted copy the Auction Agreement is attached hereto as **Appendix "E"**, and the unredacted copy is attached as **Confidential Appendix "4"**.

77. A summary of the non-commercially sensitive key terms of the Auction Agreement is provided below.

Summary of the Auction Agreement	
Purchaser	<ul style="list-style-type: none"> Corporate Assets Inc.
Transaction Type	<ul style="list-style-type: none"> Sale of assets and auction with NMG Form of Approval and Vesting Order
APA Date	<ul style="list-style-type: none"> August 4, 2023
Net Minimum Guarantee Amount	<ul style="list-style-type: none"> Confidential
Net Minimum Guarantee Sharing Formula	<ul style="list-style-type: none"> The Receiver is entitled to an agreed share of any proceeds of sale of the Auctioneer Purchased Assets realized by the Auctioneer in excess of the NMG plus an expense reimbursement amount in favour of the Auctioneer The Auctioneer may solicit offers to purchase the Auctioneer Purchased Assets prior to closing. The proceeds of any of the Auctioneer Purchased Assets sold to a party other than the Auctioneer pursuant to a private sale shall be paid to the Receiver and credited against the amount of the NMG payable on closing
Deposit Received	<ul style="list-style-type: none"> Confidential
Purchased Assets	<ul style="list-style-type: none"> The tangible assets of the Debtors listed in Schedule A of the Auction Agreement, consisting primarily of machinery and equipment located at the Kitchener Facility and certain residual equipment at the Windsor Facility
Landlords	<ul style="list-style-type: none"> Following closing of the Auction Transaction, the Auctioneer will conduct the Auction and shall have access to the Kitchener Facility and Windsor Facility up to and including December 15, 2023 to allow for the sale and removal of the Auctioneer Purchased Assets The costs of occupation in respect of the Kitchener Facility are to be borne by the Receiver The Receiver has communicated with the landlords of these premises and advised them of the occupation period contemplated in the Auction Agreement, and AarKel has agreed to provide reasonable access to the Windsor Facility in respect of the residual Windsor assets which form part of the Auction Agreement
Conditions to Closing	<ul style="list-style-type: none"> The Auction Transaction is subject to certain conditions, including within 30 days of the date of the Auction Agreement obtaining an order of the Court:

	<ul style="list-style-type: none">○ authorizing the Receiver to enter into the Auction Agreement○ permitting the Receiver to provide access to the Auctioneer for the purpose of the sale to December 15, 2023○ following closing of the Auction Transaction, permitting the Auctioneer to conduct the sale or re-sale of the Auctioneer Purchased Assets to one or more purchasers by way of public or private sale in accordance with the Auction Agreement○ conveying to the Auctioneer on closing the right, title and interest of the Receiver, if any, in the Auctioneer Purchased Assets free and clear of all liens and encumbrances● The Auction Transaction contemplates the delivery by the Receiver to the Auctioneer on the closing date of a bill of sale conveying to the Auctioneer the right, title, and interest of the Debtors and the Receiver in and to the Auctioneer Purchased Assets free from all liens and encumbrances on an “as is, where is” basis without representation or warranty.
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The Receiver’s Observations

78. The Receiver makes the following observations with respect to the Auctioneer Transaction for consideration by the Court: The Receiver recommends that the Court approve the Auctioneer Transaction, authorize and approve the execution of the Auction Agreement by the Receiver, direct the Receiver to take such steps necessary to complete the Auctioneer Transaction, and vest in the Auctioneer the right, title and interest of the Receiver and the Debtors in and to the Auctioneer Purchased Assets on closing of the Auctioneer Transaction, free and clear of all liens and encumbrances, for the following reasons:

- (a) the Sale Process was authorized by the Court pursuant to section 3(j) of the Receivership Order;
- (b) as set out above, the Receiver has conducted a fair, transparent, and commercially reasonable sale process which effectively canvassed the market, generated significant interest and exposure with the Potential Purchasers, and resulted in the receipt of multiple bids supported by deposits;
- (c) the cost of removing the Auctioneer Purchased Assets from the respective premises would be prohibitive relative to their value, with the result that any sale of such assets must be conducted from the premises. Given the ongoing costs of occupation of the premises, the limited time available to the Receiver to occupy the premises and the responses received from interested parties pursuant to the Sale Process, the Receiver has determined that continued marketing of the Auctioneer Purchased Assets and business

conducted at the Kitchener Facility is unlikely to produce a superior net realization as compared to the Auctioneer Transaction;

- (d) the Sale Process was robust in the circumstances and sufficiently exposed the Property to prospective purchasers and produced significant participation from prospective purchasers, resulting in the best transaction in the circumstances;
- (e) in the Receiver's view, no commercially reasonable offers were submitted from going concern purchasers for the business conducted at the Kitchener Facility;
- (f) the Auctioneer specializes in the industrial marketplace and conducts numerous industrial sales and liquidations per year;
- (g) the Auctioneer provided the highest NMG offer among the Shortlisted Bidders and the proposed terms and conditions generally complied with those requested by the Receiver. The period of occupancy at the Premises requested was similar to that of other auctioneers who participated in the Sale Process;
- (h) the Auctioneer has attended at the Kitchener Facility and Windsor Facility, and has commenced pre-marketing activities to take steps necessary to prepare for the Auction subject to Court approval; and
- (i) TD, which will suffer a significant loss on its secured loans to the Debtors, has advised the Receiver that it supports the Auctioneer Transaction.

SEALING ORDER

- 79. If the Court does not approve the AarKel APA and the Auction Agreement, or if the AarKel APA and Auction Agreement are approved by the Court but are not completed for other reasons, public disclosure of the Summary of Offers, the Summary of Auction Proposals, and the unredacted versions of the AarKel APA and Auction Agreement could materially prejudice the Receiver's ability to re-market the Property and maximize the proceeds of sale of the Property.
- 80. The Receiver is therefore seeking an order of this Court sealing (i) the Summary of Offers; (iii) the Summary of Auction Proposals, and (iv) the unredacted versions of the AarKel APA and Auction Agreement pending further order of the Court or the completion of the transactions and auction under both of the AarKel APA and Auction Agreement.

COLLECTION EFFORTS TO DATE

81. The Receiver utilized the Debtors’ books and records and held discussions with the remaining financial management of the Debtors to determine the respective amounts owed from each customer, and to determine accurate levels of finished goods, raw materials, and components inventory on hand applicable to such customers. The Receiver provided customers with supporting documentation and negotiated payment terms as agreed to by certain customers.
82. As at July, 31, 2023, the Receiver had entered into 21 interim and final settlement and release agreements with certain customers of the Debtors which provide for, among other things, payment to the Receiver of an agreed amount with respect to outstanding accounts receivable, the sale of inventory on hand and/or additional parts to be produced by the Receiver to mitigate disruptions, and the coordinated removal of customer Tools and, in certain cases, assisting with compilation of CAD and other design data.
83. The table below sets out total cash recoveries of pre-receivership A/R and post-receivership operations to July 31, 2023 in the approximate amounts of \$4.1 million plus US \$864,000:

Description	CAD (in 000's)	USD (in 000's)
Collection of outstanding accounts receivable as at May 25, 2023	2,374	634
Collections from post-receivership sales (net of HST)	1,727	230
Total cash receipts from A/R and post-receivership sales to July 31, 2023	4,101	864

STATEMENT OF RECEIPTS AND DISBURSEMENTS

84. Attached as **Appendix “F”** is a cumulative Statement of Receipts and Disbursements for the period May 26, 2023 to July 31, 2023. As at July 31, 2023, the closing cash balance was approximately (i) Cdn \$2.588 million plus (ii) approximately US\$135,000.

RECEIVER’S RECOMMENDATIONS

85. For the reasons set out above, the Receiver recommends that the Court make Orders:
- (a) approving this First Report and the activities of the Receiver, including steps taken in dealing with the Property, as described in this First Report;
 - (b) approving the AarKel Transaction and authorizing and directing the Receiver to enter into and carry out the terms of the AarKel APA, together with any further amendments thereto deemed necessary by the Receiver in its sole discretion, and vesting the right,

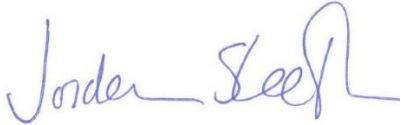
title, and interest of the Receiver and the Debtors in and to AarKel in respect of the Windsor Property upon closing of the AarKel Transaction;

- (c) approving the Auction Transaction and authorizing and directing the Receiver to enter into and carry out the terms of the Auction Agreement, together with any further amendments thereto deemed necessary by the Receiver in its sole discretion, and vesting the right, title, and interest of the Receiver and the Debtors in and to Corporate Assets in respect of the Auctioneer Purchased Assets upon closing of the Auction Transaction;
- (d) authorizing and directing the Receiver to enter into negotiations to sell the Property to any other party identified through the Sale Process or otherwise if the AarKel APA and/or Auction Agreement are terminated in accordance with their terms;
- (e) temporarily sealing from the public record pending further order of the Court (i) the Summary of Offers attached as **Confidential Appendix “1”**; (ii) the Summary of Auction Proposals, attached as **Confidential Appendix “2”**, (iii) the unredacted version of the AarKel APA as **Confidential Appendix “3”**, and (iv) the unredacted version of the Auction Agreement, attached as **Confidential Appendix “4”**;
- (f) approving the Receiver’s Statement of Receipts and Disbursements for the period May 26, 2023 to July 31, 2023.

All of which is respectfully submitted at Kitchener, Ontario this 15th day of August, 2023.

DELOITTE RESTRUCTURING INC.,
solely in its capacity as the Court-appointed
Receiver of Injection Technologies Inc., Moldco
Plastics Inc., and Moldco Holdings Inc., and
without personal or corporate liability

Per:



Jorden Sleeth, CPA, CA, CIRP, LIT
Senior Vice-President



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

THE TORONTO-DOMINION BANK

-and- INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.

Applicant

Respondents

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

PROCEEDING COMMENCED AT
TORONTO

**FIRST REPORT OF THE RECEIVER, DELOITTE
RESTRUCTURING INC.**

HARRISON PENZA LLP

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Lawyers for Deloitte Restructuring Inc., in its capacity as proposed
Court-appointed Receiver

APPENDIX "C"

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.**

Respondents

**REPORT OF DELOITTE RESTRUCTURING INC.
IN ITS CAPACITY AS THE PROPOSED RECEIVER OF
INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.
DATED MAY 19, 2023**

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APPENDICES

APPENDIX	DESCRIPTION
A	The Proposed Receiver's Sale Process Document

INTRODUCTION

1. An application has been made before the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) by The Toronto-Dominion Bank (“**TD**” or the “**Bank**”) for an order (the “**Receivership Order**”) appointing Deloitte Restructuring Inc. (“**Deloitte**”) as receiver and manager, pursuant to section 243(1) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended (the “**BIA**”), and section 101 of the *Courts of Justice Act* R.S.O. 1990 c. C.43, as amended (the “**Receiver**”), of the assets, undertakings and properties (collectively, the “**Property**”) of Injection Technologies Inc. (“**ITI**”), Moldco Plastics Inc. (“**MPI**”), and Moldco Holdings Inc. (“**Moldco Holdings**”, and together with ITI and MPI, the “**Debtors**”) acquired for, or used in relation to a business carried on by the Debtors.
2. ITI and MPI operate as injection molded plastic parts manufacturers from two facilities located in Windsor and Kitchener. Moldco Holdings is the owner of certain equipment used in the operations. Historically, production focused on automotive customers and later expanded into consumer and medical instrument products in Kitchener.
3. The Windsor operations also include a longstanding tryouts/trials (“**Tryouts**”) business from which customers use equipment and personnel at the Windsor Facility to test molds prior to mass production at their own facilities.
4. TD is the senior secured lender to the Debtors pursuant to credit, loan, and equipment lease agreements (the “**TD Loan Agreements**”) granted by TD (the “**TD Indebtedness**”) and is owed in excess of Cdn \$13.0 million and US \$1.9 million as at May 1, 2023, all before legal costs, applicable disbursements, and accrued interest.
5. In February 2023, Deloitte was retained as financial advisor to TD to, among other things, review the Debtors’ current operations, financial position, and business viability.
6. As set out below, and in the Lafortune Affidavit (defined below), the Debtor is facing significant financial and operational issues, has run out of liquidity, and has lost the support of TD. A receivership will allow for an immediate marketing of the Debtors’ assets and business on an expedited basis to maximize recovery for the stakeholders.
7. Deloitte is a licensed trustee within the meaning of section 2 of the BIA and has consented to act as Receiver in these proceedings in the event that this Court grants the Receivership Order. The purpose of this report (the “**Report**”) as proposed Receiver of the Debtors (the “**Proposed Receiver**”) is to:

- (a) provide the Court with an overview of the Debtors' business and Property, including its corporate structure, certain assets and liabilities, unusual and unexplained events and account balances, and the current state of the affairs of the business; and
- (b) describe the proposed sale process (the "**Sale Process**") in respect of the assets and operations of the Debtors which, subject to Court approval, is to be commenced forthwith following the issuance of the Receivership Order.

TERMS OF REFERENCE

8. In preparing this Report, Deloitte has been provided with, and has relied upon, unaudited, draft and/or internal financial information, the Debtors' books and records, and discussions with management of the Debtors ("**Management**") (collectively, the "**Information**"). Except as described in this Report:
- (a) Deloitte has reviewed the Information for reasonableness, internal consistency and use in the context in which it was provided. However, Deloitte has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards ("**CAS**") pursuant to the Chartered Professional Accountants Canada Handbook, and, accordingly, Deloitte expresses no opinion or other form of assurance contemplated under CAS in respect of the Information; and
 - (b) Deloitte has prepared this Report in its capacity as the Proposed Receiver to support the Court's consideration of the relief being sought by TD in its application for the Receivership Order and, subject to the granting of the Receivership Order, the relief being sought by the Proposed Receiver in its motion for approval of the Sale Process. Parties using the Report other than for the purposes outlined herein are cautioned that it may not be appropriate for their purposes.
9. Unless otherwise stated, all dollar amounts contained in the Report are expressed in Canadian dollars.
10. Reference is made to the Affidavit of Mathieu Lafortune, sworn May 15, 2023 (the "**Lafortune Affidavit**"), in support of TD's application for the appointment of Deloitte as receiver of the Property, and approval of the Sale Process.
11. Unless otherwise provided, all other capitalized terms not otherwise defined in this Report are as defined in the Lafortune Affidavit.

BACKGROUND

Overview

12. ITI is a Windsor-based injection molded plastic parts manufacturer and customer tryouts/trials facility in operation since 1990. Historically, ITI specialized in mold try-outs and service business, and expanded its short batch and extended run production following the MPI acquisition in March 2020.
13. ITI operates from the Windsor Facility (defined below) which it owned until completing a sale-leaseback transaction in March 2022. MPI is a guarantor under that lease.
14. Pursuant to a share purchase agreement dated February 29, 2020 (the “**MPI Purchase Agreement**”), 1241704 BC Ltd. (“**124 BC**”) purchased the shares of Moldco Inc. and 2426496 Ontario Inc. (“**242 Ontario**”) from the 2013 Gary Paul Cluthe Family Trust (the “**Cluthe Family Trust**”) for cash consideration plus a vendor take-back promissory note (the “**Cluthe VTB**”).
15. Subsequently, Moldco Inc. changed its name to “Moldco Plastics Inc.” and 242 Ontario changed its name to “Moldco Holdings Inc.”. In addition to ITI and MPI, the Company also operates under the banners Inject Tech Plastics, MoldCo Inc., and IT Group.
16. MPI is a Kitchener-based injection molded plastic parts manufacturer specializing in small batch and extended run production along with sub-assembly of molded components. As detailed later in this Report: (i) MPI moved into the Kitchener Facility (defined below) for which ITI is the named tenant, and (ii) MPI subleases the Old Kitchener Premises (defined below) to a major customer.
17. While ITI and MPI are distinct legal entities, they are being operated as though they are a single entity in certain circumstances (e.g. purchase orders issued to one entity but production performed at both plants, ITI being the named tenant on MPI’s real property lease, etc.). All MPI production is conducted at the Kitchener Facility. However, ITI production is conducted at both the Windsor Facility and the Kitchener Facility. Tryouts are conducted solely by ITI at the Windsor Facility.
18. Management advised that Moldco Holdings owns certain fixed assets located in Kitchener, but has no operations, employees, or other known assets.
19. The Debtors have a July 31st fiscal year-end (“**FY**”) date. On a combined basis, the Debtors’ internal unaudited financial statements report FY2022 revenues of approximately \$25.5 million. The Debtors’ internally unaudited financial statements report fiscal year-to-date sales to January 31, 2023 of approximately \$14.2 million.

20. The Debtors’ workforce consists of 160 employees, of which 140 are hourly staff and 20 are salaried staff. Further, 82 employees are classified under “Windsor” payroll and 78 employees under “Kitchener” payroll. None of the employees are represented by a union and the Debtors do not sponsor a pension plan.
21. Moldco Holdings did not have any employees and was administered by ITI and MPI management.
22. A summary of the Debtors’ leased locations, production summary, production profile, and approximate headcount as of April 2023 is as follows:

Description	ITI	MPI	Moldco Holdings
Plant Premises	4350 Industrial Drive, Windsor, ON (the “ Windsor Facility ”) <ul style="list-style-type: none"> • Sale-Leaseback in March 2022 • Term: 20 years • Square Feet: 47,885 • Guarantor on lease: MPI 	41 Ardelt Place, Kitchener, ON (the “ Kitchener Facility ”) <ul style="list-style-type: none"> • Term: October 1, 2020 to September 30, 2027 • Square Feet: 67,550 • Tenant: Lease in the name of Injection Technologies Inc. 	N/A
Offsite Warehouse Premises	2051 Ambassador Drive, Windsor, ON (the “ Windsor Warehouse ”)	965 Wilson Ave., Kitchener, ON (the “ Old Kitchener Premises ”) <ul style="list-style-type: none"> • Customer Sublease Agreement of October 29, 2021, extended to November 30, 2023. 	N/A
Production Summary	Mold tryouts, service, short batch, and extended run production. 2 shifts / day (16-hour coverage), 5 days / week. Currently operating at 60-65% of plant capacity	Small batch and extended run production, assembly of molded components. 3 shifts / day (24-hour coverage), 5 days / week. Currently operating at 45% of plant capacity	N/A – Fixed Assets

23. As described later in this Report, the Debtors failed to effectively integrate the Windsor and Kitchener businesses, which were further complicated by, among other things, (i) an expansion into a new, larger and costly leased facility in Kitchener, (ii) the departure of its longstanding CEO in mid-2022 and a rapid series of unsuccessful replacements, (iii) challenges in using two unintegrated

accounting systems, (iv) the FY 2022 audited financial statements and tax returns remain outstanding after 9 months with no immediate timeline to completion, (v) unexplained excessive inventory value build-up and recently disclosed \$6.2 million inventory impairment, (vi) an outstanding accounting of the uses of net proceeds from the 2022 sale lease-back transaction for the Windsor Facility to the satisfaction of the Proposed Receiver, (vii) significant accumulated sales tax and unremitted payroll tax liabilities, and Canada Revenue Agency (“CRA”) has recently commenced a payroll trust exam, (viii) the Debtors are in default of the TD credit agreement, (ix) the Debtors filed monthly borrowing limit certificates with TD which reported major margin shortfalls of \$5.1 million and \$6.7 million as at December 31, 2022 and January 31, 2023, respectively, (xi) the Debtors have forecast a reliance on the out-of-margin availability of the majority of the \$10 million TD line of credit for the next 12 months; (xii) certain suppliers have placed the Debtors on cash-on-demand (COD) terms, and (xiii) the Debtors are thinly capitalized and out of liquidity.

Corporate Background

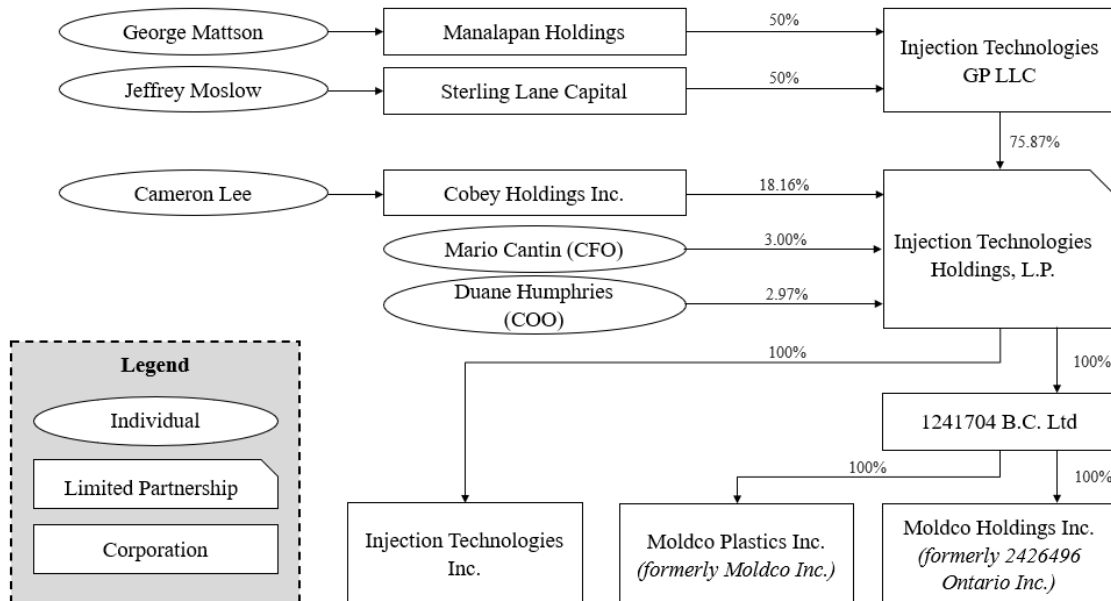
24. ITI is a British Columbia (“BC”) corporation formed by the amalgamation of Injection Technologies Acquisition Company Inc. and Injection Technologies Inc. (an Ontario corporation) on July 31, 2015.
25. MPI is a BC corporation, originally incorporated in Ontario on June 20, 2013 as Moldco Inc. and continued in BC as of January 29, 2021.
26. Moldco Holdings is a BC corporation, originally incorporated in Ontario on July 15, 2014 as 2426496 Ontario Inc. and continued in BC as of January 29, 2021. It is extra-provincially registered in Ontario.
27. ITI, MPI, and Moldco Holdings share a stated registered office is in Vancouver, BC, however, none of the Debtors have any BC-based employees, management, or operations.
28. Based on Deloitte’s review of corporate searches for each of the Debtors:
 - (a) George Mattson (“**Mattson**”) and Jeffrey Moslow (“**Moslow**”) are directors (the “**Directors**”) of each of the Debtors;
 - (b) Cameron Lee (“**Lee**”) is listed as registered officer of ITI, and there are no registered officers of MPI and Moldco Holdings; and
 - (c) Each of the Debtors are “not in good standing” with the BC Registry Services.
29. Injection Technologies Holdings, L.P. (“**Injection Holdings**”) owns 100% of ITI and 124 BC.

30. 124 BC was incorporated in February 2020 and owns 100% of MPI and Moldco Holdings.

31. The ultimate shareholders of Injection Holdings, 124 BC, ITI, MPI, and Moldco Holdings are as follows:

- (a) Mattson and Moslow are the majority shareholders and are experienced senior finance professionals and investors based in the United States;
- (b) Lee who served as Chief Executive Officer of ITI from 2006 and later the combined Company until taking a leave of absence in mid-2022 on which in remains as of the date of this Report;
- (c) Mario Cantin is the Chief Financial Officer (“**Cantin**” or “**CFO**”) and was hired in early 2022 and is based in Kitchener; also assumed role of interim General Manager of the Kitchener operations following the departure of Lee and other interim General Managers; and
- (d) Duane Humphries, a longstanding ITI employee based in Windsor, and was appointed as Chief Operating Officer (“**Humphries**” or “**COO**”) in 2022.

32. The Proposed Receiver understands that the corporate structure of the Debtor is as follows:



SELECT HISTORICAL FINANCIAL POSITION AND OPERATING RESULTS

33. The Debtors reported revenue of \$25.3 million and \$25.5 million on a combined basis in FY2021 and FY2022, respectively.
34. On March 18, 2022, ITI closed a sale-leaseback transaction (the “**Windsor Sale-Leaseback**”) with respect to its interest in the land and building constituting the Windsor Facility. This resulted in an accounting and taxable gain for FY 2022.
35. The Windsor Sale-Leaseback did not improve the Debtor’s liquidity. Management advises that a portion was used to partially pay certain payroll tax arrears and the balance of surplus funds was used to pay trade payables owing to suppliers. A detailed accounting for the use of the Windsor Sale-Leaseback proceeds remains outstanding.

CERTAIN ASSETS

Inventory

36. The Debtor recently disclosed to TD a downward inventory provision of \$6.2 million (the “**Inventory Provision**”). Management advised the Proposed Receiver that the Debtors became aware that inventory was overstated on or about July 2022, and that it took until early 2023 to arrive at a final amount of the provision. However, they have not yet provided a reasonable explanation or detailed accounting of the Inventory Provision, but have cited the following possible reasons:
 - (a) Possible write-off of raw materials upon transfer from the Old Kitchener Premises to the new Kitchener Facility, although management has not confirmed nor provided details on whether these were expired/obsolete/unsubstantiated raw materials which should have written down on the acquisition or move date;
 - (b) Internal costing and accounting system limitations; and
 - (c) Certain customer inventory stored by the Debtors may have been incorrectly counted as owned by MPI.
37. Management informed the Proposed Receiver that the Inventory Provision has not yet been processed through the income statement as the FYE 2022 audit remains in-progress. Should it be appointed, the Proposed Receiver intends to liquidate the finished goods inventory to existing customers. Raw materials will be used in ongoing production or otherwise liquidated.

Fixed Assets

38. The Debtors' fixed assets are primarily comprised of machinery and equipment located the Windsor Facility, Kitchener Facility, and Windsor Warehouse.
39. Certain of the machinery and equipment appear to be subject to leases, such as: TD (various), Bank of Montreal (one large machine), Wells Fargo (lease payments appear complete), and De Lage Landen (forklifts). As described later in this Report, should it be appointed, the Proposed Receiver will (i) compile and review lease documentation and (ii) retain independent legal counsel to conduct a security review.
40. As described later in this Report, the Proposed Receiver's proposed Sales Process contemplates offering the fixed assets for sale to interested bidders and/or auctioneers.

CREDITORS

Secured Creditors

41. Based on a review of the Debtors books and records, and PPSA registrations, the following are the Debtor's primary secured creditors:
 - (a) TD is the senior secured lender and is owed in excess of Cdn \$13.0 million and US \$1.9 million as at May 1, 2023, all before legal costs, applicable disbursements, and accrued interest. This consists of a line of credit, term loans, and equipment leases;
 - (b) Bank of Montreal is a secured creditor pursuant to a lease for a large equipment unit at the Windsor Facility;
 - (c) De Lage Landen is a secured creditor pursuant to operating leases for forklifts located in Windsor and Kitchener;
 - (d) BMW Group Financial Services Canada is a secured creditor pursuant to a vehicle lease;
 - (e) Meridian OneCap Credit Corp is a secured creditor with respect to certain equipment; and
 - (f) The Cluthe Family Trust is a secured creditor pursuant to a general security agreement in connection with the Cluthe VTB.
42. The Proposed Receiver intends to retain Harrison Pensa LLP as independent legal counsel to, among other things, conduct a review of the security granted by the Debtors to each of the secured

parties listed above and report to the Court on the results of that security review in a subsequent motion.

Trade Creditors

43. The Debtors' have accounts payable and accrued liabilities owing to numerous vendors located in Canada and the United States of which the largest balances are payable to resin suppliers.

Taxes

44. ITI has an unremitted HST liability of \$695,000 as at January 31, 2023, which balance has accumulated over a year. In early 2023, CRA and ITI agreed to a monthly payment plan to repay this HST liability.
45. Management disclosed that ITI accumulated an unremitted employee source deductions balance during a period when ITI manually processed payroll internally. Management advised that this issue was remedied on a go-forward basis once ITI transitioned its payroll to an external payroll services provider in October 2021 for ongoing remittances. Management advised that ITI has subsequently remitted payments and has calculated a reduced balance of \$488,000 as at January 31, 2023. However, the CRA payroll account statements indicate that \$1.3 million remains outstanding. Management indicated that \$859,000 of ITI payments on account of payroll tax arrears were inadvertently applied by CRA to MPI's payroll tax number. Management and its external accountant advised that supporting documentation has been furnished to CRA to correct this error, however, it is unclear if CRA has made the appropriate corrections to their records. The Proposed Receiver understands that the CRA is conducting a review of the Debtors payroll and HST accounts.
46. The Debtors' external accountant has not finalized the FY2022 audit and corporate income tax returns. On a preliminary basis, the external accountant estimated (i) modest corporate income tax refunds for each of the Debtors, and (ii) modest SR&ED refunds for ITI and MPI.

Government Loans

47. The Debtors have two loans with respect to the Federal Economic Development Agency for Southern Ontario (Regional Relief and Recovery Fund), which Management advises are unsecured loans.

THE CURRENT CIRCUMSTANCES FACING THE DEBTORS

48. The above events have left the Debtors in the following situation:
- (a) the business continues to generate losses and is operating at under-capacity, particularly the Kitchener Facility;
 - (b) they have intertwined their operations and obligations, and have a non-integrated financial reporting structure;
 - (c) they have disclosed significant payroll tax and sales tax arrears;
 - (d) cash resources have been almost entirely depleted, and it has no sources of equity injections or funding. The Debtors are unable to maintain payments to its lenders, vendor payment terms have been stretched and they have inadequate operating cash levels. The Debtors are in a significant margin shortfall under the TD line of credit, and are relying on the maximum \$10 million borrowing limit to maintain operations; and
 - (e) they are in default of the TD Loan Agreements and TD is enforcing on its security. The Debtors are unable to repay or refinance the secured indebtedness owed to TD under the TD Loan Agreement.
49. Based on the foregoing, the Proposed Receiver is of the view that the Debtor is insolvent.

THE RECEIVER'S PROPOSED SALE PROCESS

Business and Asset Lots for Sale

50. Should it be appointed, the Proposed Receiver intends to temporarily operate the business from the Windsor Facility and Windsor Warehouse (the “**Windsor Business**”) to a certain extent with the view of finding a going-concern purchaser and realize value on its legacy Tryouts business. This is contingent on, among other things, the Proposed Receiver negotiating payment terms with customers to the satisfaction of the Proposed Receiver.
51. Management acknowledged that operations at the Kitchener Facility were not viable in their current form, and it had formulated a preliminary plan to winddown its Kitchener operations and transfer certain customers and machinery to the Windsor Facility. That plan has not been implemented as of the date of this Report. The Proposed Receiver also notes that operations at the Kitchener Facility require significant capital, liquidity, and operational investments in order to make it viable. In addition, the Kitchener operations’ high monthly overhead cost structure, unclear product

costing, disorganized financial reporting platform, and significant excess capacity make it unlikely it would sell on a going concern basis with full operations. However, the Proposed Receiver will evaluate the commercial reasonableness of maintaining partial operations at the Kitchener Facility with a view to continuing production for specific customer contracts for a limited period. Consequently, the Proposed Receiver proposes to market the Windsor Business as well as the assets located in Windsor and Kitchener.

52. As a result, the Proposed Receiver has developed a proposed sales process which is set out in the attached **Appendix “A”** (the **“Sale Process”**). The Sales Process involves separating the various assets into lots by location and sub-lots (the **“Lots”** and **“Sub-Lots”**, respectively) as listed in an electronic data room (the **“Data Room”**) to be established by the Proposed Receiver. Bids can be submitted for the Windsor Business and/or any or all of the Lots or Sub-Lots, which can be summarized as follows:

- (a) **The Windsor Business:** The operations and assets, including in Lots 1 and 3, used in the Windsor Business. A bid for the Windsor Business shall specify which of the following numbered lots are included;
- (b) **Lot 1:** Fixed assets, including machinery and equipment, located at the Windsor Facility;
- (c) **Lot 2:** Fixed assets, including machinery and equipment, located at the Kitchener Facility;
- (d) **Lot 3:** Fixed assets, including machinery and equipment, located at the Windsor Warehouse;
- (e) **Lot 4:** All raw material inventory, work-in-process inventory, and finished goods inventory, which are not otherwise used in operations or sold to customers at each of:
 - (i) Lot 4(a) - The Windsor Facility,
 - (ii) Lot 4(b) – The Kitchener Facility;
 - (iii) Lot 4(c) - The Windsor Warehouse; and
- (f) **Lot 5:** All intellectual property of the Debtors, excluding any intellectual property which may be included in a transaction for the Windsor Business.

53. The accounts receivable of the Debtors may be made available for an assignment or sale to a Prospective Bidder, in the sole discretion of the Proposed Receiver.

54. The Proposed Receiver reserves its right to add or remove assets from the Lots and Sublots prior to the Bid Deadline.
55. Purchasers seeking only to purchase the Windsor Business and assets located at the Windsor Facility and Windsor Warehouse are only required to submit one Binding Bid. If such parties are also interested in assets located in Kitchener, a separate bid(s) will be required for Lots or Sublots 2, 4, and 5 in respect of the Kitchener assets.

Timeline

56. The Sale Process is a robust process intended to broadly market the assets in a reasonable timeframe. A chronology of the key activities to be undertaken by the Proposed Receiver is set out below.

Timing	Activity
Day 1 to 5	<ul style="list-style-type: none"> • Identification of potential purchasers (each, a “Potential Purchaser”). • Preparation of a marketing teaser (the “Teaser”) and form of non-disclosure agreement (“NDA”) for circulation to Potential Purchasers. • Compile and review information that will be required by Potential Purchasers to assess their offer(s) for the assets. • Establish and commence populating the Data Room with information for Potential Purchasers who executed an NDA to assess the equipment and acquisition opportunity.
Day 5 to 7	<ul style="list-style-type: none"> • Launch the market outreach campaign with an email distribution of the Teaser and NDA to Potential Purchasers. • Advertise in an industry publication. • Commence arranging third-party inspection of assets and preparation of equipment listing for use by Potential Purchasers. • Respond to in-bound calls and inquiries.
Day 15-20	<ul style="list-style-type: none"> • The Receiver’s template forms of offer to be posted in the Data Room for use by Prospective Bidders: <ul style="list-style-type: none"> ○ Agreement of Purchase and Sale re Windsor Business – The Receiver’s template form of Agreement of Purchase and Sale ○ Asset Purchase Agreement / Auction Proposal – The Receiver’s template form of Asset Purchase Agreement and/or Terms and Conditions for an auction proposal
Day 8 to 30	<ul style="list-style-type: none"> • Continue outreach to Potential Purchasers, respond to inquiries, and execution of NDAs. • Ongoing compilation and review of information, updating the Data Room.

Timing	Activity
	<ul style="list-style-type: none"> Coordinate site visits and review of assets by Prospective Bidders.
Day 31	<ul style="list-style-type: none"> Bid deadline for submission of bids, including conditions, supplemental bidder information about its operational background, experience, corporate disclosures, and financial capability (the “Bid Deadline”).
Day 31 to 35	<ul style="list-style-type: none"> Review of bids (each, a “Bid”), selection of shortlisted Bids (each, a “Shortlisted Bid”), correspondence and clarifying questions with Shortlisted Bids, and consultations with stakeholders.
Day 35	<ul style="list-style-type: none"> Selection of the most advantageous Shortlisted Bid(s), conditional on Court approval.
Day 35 to 40	<ul style="list-style-type: none"> Negotiation with the successful bidder(s) and execution of a definitive agreement (a “Definitive Agreement”).
Day 45 to 50	<ul style="list-style-type: none"> Projected date to seek the Court’s approval of the successful purchaser and the corresponding Definitive Agreement (the “Sale Approval Hearing”).
Day 51 to 55	<ul style="list-style-type: none"> Close the transaction (the “Sale Transaction”) set out in the Definitive Agreement. Implement terms of the Definitive Agreement (if applicable). Targeted date for removal of all Property and vacate associated leased premises.
TBC - Auction Timing	<ul style="list-style-type: none"> Period and terms of continued occupancy to facilitate an auction at each or all of the Windsor Facility, Kitchener Facility, and Windsor Warehouse to be negotiated and subject to the Receiver’s discretion.

57. The condensed timeline proposed in the table above reflects the lack of liquidity to fund ongoing protective disbursements, including ongoing Windsor payroll and interim occupancy costs with multiple leased locations. Accordingly, the Receiver believes the Sale Process is reasonable in the circumstances set out above. However, the Proposed Receiver reserves the right to modify or extend the timeframes set out above should it deem it necessary to maximize the realizations from the Property.

Other Terms and Conditions

58. The following is a summary of other key terms and conditions of the Sale Process:

- Purchasers are only required to submit one bid for the Windsor Business and assets located in Windsor.

- Prospective Bidders that operate as an auctioneer (an “**Auctioneer**”) shall submit two bids required for the assets as follows:
 - Cash Purchase Price – An offer to purchase and take title to all of the Property, Lots, or Sublots. Such offers must ascribe bid values to permit the Proposed Receiver to allocate them between other secured creditors as may be applicable and required; and
 - Net Minimum Guarantee – Bidder offers to pay a specified minimum amount for all the machinery and equipment to be auctioned (a “**Net Minimum Guarantee**” or “**NMG**”), plus the proceeds from auction above the NMG would be shared by allocation between the bidder and the Proposed Receiver based upon a negotiated / proposed structure
- Each Auctioneer bid shall (i) provide a brief description of its corporate background, including but not limited to prior experience for projects of this size/scope, and any prior experience in the automotive or manufacturing industry; (ii) demonstrate an in-depth knowledge of the various asset classes available and clear insight on the appropriate channels to market these assets to maximize recovery; (iii) provide evidence of financial ability to close the proposed transaction (e.g. Proof of Funds letter) and appropriate insurance to conclude the transaction; and (iv) specify any partners that would participate in the transaction.
- Each Auctioneer shall outline an opinion on the estimated value range of recovery/price per asset/unit on the asset listing included in the Data Room.
- A listing of the assets will be provided to Potential Purchasers; however, as a starting point interested parties are responsible to conduct their own diligence on the assets. An asset sale is meant to include all assets wall-to-wall, floor-to-ceiling with the exception of items that must remain affixed to building, leased items, and items that would typically remain with a leased building (e.g. HVAC, lighting, doors, electrical, plumbing, etc.).
- All assets will be sold “as-is”, “where-is” without warranty or liability.
- Each bidder to provide its opinion on the estimated value range of recovery/price per asset on the asset listing and in total.
- Bidders will be responsible for: (i) coordinating with the local management on-site appropriate documentation to facilitate sale and asset removal; (ii) coordinating removal of all assets using bonded and insured riggers and service providers; and (iii) leaving the

respective leased facility in an orderly condition and for restoring any damages caused to the premises that occurs as a result of the asset removal.

- The Receiver will assess and consider whether the Bids, if any, are likely to be consummated and in the best interest of stakeholders.
- The Receiver shall review all such Bids and may, but shall have no obligation to, enter into a Definitive Agreement with the Potential Purchaser or Potential Purchasers who submitted the best, highest, or otherwise most favourable bid. The Receiver reserves its right not to accept any bid or to vary the terms of or terminate the Sale Process. The Receiver reserves the right to deal with one or more bidders to the exclusion of others and to accept a bid or bids for some or all of the Property.

59. For greater certainty, paragraphs 52 to 58 this Report are of a summary nature and the terms provided for in the Sales Process at Appendix “A” shall govern.

RECEIVER’S BORROWINGS

60. The draft Receivership Order provides for the Proposed Receiver to borrow up to \$2.0 million by way of Receiver’s certificates. Based on its preliminary analysis, the Receiver believes this should be sufficient to fund receivership operations until the Sale Process can be implemented and proceeds from the sale of the Property collected. In the event that circumstances dictate that the Proposed Receiver would require further funding beyond the maximum set out above, it will return to Court to seek to have the maximum borrowing capacity increased. TD Bank has agreed to provide funding through Receiver’s Certificates throughout the receivership process.

61. The Receiver expects that borrowings may be required to fund existing and ongoing obligations, including but not limited to: payroll, rent, security, utilities, various other protective disbursements, and professional and legal costs that will be incurred during the receivership. The Receiver believes that such borrowings are necessary and appropriate for the benefit of all stakeholders and to enhance value in undertaking the Sale Process. The Receiver intends to utilize such borrowings subject to the timing of collections of A/R and inventory sales.

PROPOSED RECEIVER’S RECOMMENDATIONS

62. For the reasons set out above, and in the event the Court grants the Appointing Order, the Receiver recommends that the Court approve the processes of disposition as described and proposed in this Report.

All of which is respectfully submitted at Toronto, Ontario this 19th day of May, 2023.

DELOITTE RESTRUCTURING INC.,
solely in its capacity as the proposed
Court-appointed Receiver of
Injection Technologies Inc., Moldco Plastics
Inc., and Moldco Holdings Inc., and
without personal or corporate liability



Per:

Jorden Sleeth, CPA, CA, CIRP, LIT
Senior Vice-President



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

THE TORONTO-DOMINION BANK

-and- INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.

Applicant

Respondents

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

PROCEEDING COMMENCED AT
TORONTO

**PRE-FILING REPORT OF THE PROPOSED RECEIVER,
DELOITTE RESTRUCTURING INC.**

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Court-appointed Receiver

APPENDIX "D"



Court File No. CV-23-00699663-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

THE HONOURABLE) FRIDAY, THE 25th
JUSTICE CONWAY) DAY OF AUGUST, 2023

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO HOLDINGS INC.

Respondents

APPROVAL AND VESTING ORDER

THIS MOTION, made by Deloitte Restructuring Inc. in its capacity as the Court-appointed receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors") appointed pursuant to the Order of Justice Steele dated May 26, 2023 (the "Appointment Order"), for an order approving the sale transaction (the "Transaction") contemplated by an Asset Purchase Agreement (the "Sale Agreement") between the Receiver and AarKel Testing Technologies Inc. (the "Purchaser") dated July 28, 2023 and appended to the Report of the Receiver dated August 15, 2023 (the "Report"), and vesting in the Purchaser the Debtors' right, title and interest in and to the Purchased Assets as defined and described in the Sale Agreement (the "Purchased Assets"), was heard this day by judicial videoconference via Zoom at 330 University Avenue, Toronto, Ontario.

ON READING the Report and the Appendices thereto, the Factum of the Receiver dated August 21, 2023, and on hearing the submissions of counsel for the Receiver and any other counsel present, no one appearing for any other person on the service list, although properly served as appears from the affidavit of service of Lindsay Ferguson sworn August 16, 2023, and the affidavits of service of Isabelle Stacey sworn August 21, 2023 and August 22, 2023, filed:

1. THIS COURT ORDERS that capitalized terms used in this Order and not otherwise defined herein shall have the meaning ascribed to them under the Sale Agreement.
2. THIS COURT ORDERS AND DECLARES that the Transaction is hereby approved, and the execution of the Sale Agreement by the Receiver is hereby authorized and approved, with such minor amendments as the Receiver may deem necessary.
3. THIS COURT ORDERS that the Receiver is hereby authorized and directed to take such additional steps and execute such additional documents as may be necessary or desirable for the completion of the Transaction and for the conveyance of the Purchased Assets to the Purchaser.
4. THIS COURT ORDERS AND DECLARES that upon the delivery of a Receiver's certificate to the Purchaser substantially in the form attached as Schedule A hereto (the "Receiver's Certificate"), all of the Debtors' right, title and interest in and to the Purchased Assets described in the Sale Agreement and listed on Schedule B hereto shall vest absolutely in the Purchaser, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the "Claims") including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Appointment Order; (ii) all charges, security interests or claims evidenced by registrations pursuant to the *Personal Property Security Act* (Ontario) or any other personal property registry system (all of which are collectively referred to as the "Encumbrances") and, for greater certainty, this Court orders that all of the Encumbrances affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.

5. THIS COURT ORDERS that for the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets, and that from and after the delivery of the Receiver's Certificate all Claims and Encumbrances shall attach to the net proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to the sale.

6. THIS COURT ORDERS AND DIRECTS the Receiver to file with the Court a copy of the Receiver's Certificate, forthwith after delivery thereof.

7. THIS COURT ORDERS that, notwithstanding:

- (a) the pendency of these proceedings;
- (b) any applications for a bankruptcy order now or hereafter issued pursuant to the *Bankruptcy and Insolvency Act* (Canada) in respect of any of the Debtors, and any bankruptcy order issued pursuant to any such applications; and
- (c) any assignment in bankruptcy made in respect of any of the Debtors;

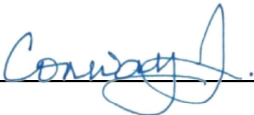
the vesting of the Purchased Assets in the Purchaser pursuant to this Order shall be binding on any trustee in bankruptcy that may be appointed in respect of the Debtors and shall not be void or voidable by creditors of the Debtors, nor shall it constitute nor be deemed to be a fraudulent preference, assignment, fraudulent conveyance, transfer at undervalue, or other reviewable transaction under the *Bankruptcy and Insolvency Act* (Canada) or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

8. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to

make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

9. THIS COURT ORDERS that the Receiver be at liberty, and is hereby authorized and empowered, to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Receiver is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

10. THIS COURT ORDERS that this Order and all of its provisions are effective as of 12:01 a.m. Toronto time on the date of this Order, and this Order is enforceable without the need for entry and filing.



Justice, Ontario Superior Court of Justice
Commercial List

Schedule A – Form of Receiver’s Certificate

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.

Respondents

RECEIVER’S CERTIFICATE

RECITALS

A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (the "Court") dated May 26, 2023, Deloitte Restructuring Inc. was appointed as the receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors").

B. Pursuant to an Order of the Court dated [DATE], the Court approved the agreement of purchase and sale made as of July 28, 2023 (the "Sale Agreement") between the Receiver and AarKel Testing Technologies Inc. (the "Purchaser") and provided for the vesting in the Purchaser of the Debtors’ right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to the Purchaser of a certificate confirming (i) the payment by the Purchaser of the Purchase Price for the Purchased Assets; (ii) that the conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and (iii) the Transaction has been completed to the satisfaction of the Receiver.

C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Sale Agreement.

THE RECEIVER CERTIFIES the following:

1. The Purchaser has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement;
2. The conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and
3. The Transaction has been completed to the satisfaction of the Receiver.
4. This Certificate was delivered by the Receiver at _____ [TIME] on _____ [DATE].

Deloitte Restructuring Inc., in its capacity as Receiver of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc., and not in its personal or corporate capacity

Per: _____

Name:

Title:

Schedule B – Purchased Assets

All assets of the Debtors listed at Section 2.01 of the Sale Agreement.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

APPROVAL AND VESTING ORDER

HARRISON PENZA ^{LLP}
Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

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Email: thogan@harrisonpensa.com
rdanter@harrisonpensa.com

Lawyers for the Receiver,
Deloitte Restructuring Inc.

APPENDIX "E"



Court File No. CV-23-00699663-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

THE HONOURABLE) FRIDAY, THE 25th
JUSTICE CONWAY) DAY OF AUGUST, 2023

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.

Respondents

APPROVAL AND VESTING ORDER

THIS MOTION, made by Deloitte Restructuring Inc. in its capacity as the Court-appointed receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors") appointed pursuant to the Order of Justice Steele dated May 26, 2023 (the "Appointment Order"), for an order approving the sale transaction (the "Transaction") contemplated by an Auction Services Agreement (the "Sale Agreement") between the Receiver and Corporate Assets Inc. (the "Purchaser") dated August 4, 2023 and appended to the Report of the Receiver dated August 15, 2023 (the "Report"), and vesting in the Purchaser the Debtors' right, title and interest in and to the Purchased Assets as defined and described in the Sale Agreement (the "Purchased Assets"), and also vesting in the purchasers at the Sale, as defined and described in the Sale Agreement (the "Additional Asset Purchasers"), the Debtors' right, title and interest in and to the Additional Assets

(as defined and described in the Sale Agreement) (the "Additional Assets"), was heard this day by judicial videoconference via Zoom at 330 University Avenue, Toronto, Ontario.

ON READING the Report and the Appendices thereto, the Factum of the Receiver dated August 21, 2023, and on hearing the submissions of counsel for the Receiver and any other counsel present, no one appearing for any other person on the service list, although properly served as appears from the affidavit of service of Lindsay Ferguson sworn August 16, 2023, and the affidavits of service of Isabelle Stacey sworn August 21, 2023 and August 22, 2023, filed:

1. THIS COURT ORDERS that capitalized terms used in this Order and not otherwise defined herein shall have the meaning ascribed to them under the Sale Agreement.
2. THIS COURT ORDERS AND DECLARES that the Transaction is hereby approved, and the execution of the Sale Agreement by the Receiver is hereby authorized and approved, with such minor amendments as the Receiver may deem necessary.
3. THIS COURT ORDERS that the Receiver is hereby authorized and directed to take such additional steps and execute such additional documents as may be necessary or desirable for the completion of the Transaction and for the conveyance of the Purchased Assets to the Purchaser.
4. THIS COURT ORDERS AND DECLARES that upon the delivery of a Receiver's certificate to the Purchaser substantially in the form attached as Schedule A hereto (the "Receiver's Certificate"), all of the Debtors' right, title and interest in and to the Purchased Assets described in the Sale Agreement and listed on Schedule B hereto shall vest absolutely in the Purchaser, free and clear of and from any and all security interests (whether contractual, statutory, or otherwise), hypothecs, mortgages, trusts or deemed trusts (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise (collectively, the "Claims") including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Appointment Order; (ii) all charges, security interests or claims evidenced by registrations pursuant to the *Personal Property Security Act* (Ontario) or any other personal property registry system (all of which are collectively referred to as the "Encumbrances") and, for greater certainty, this Court orders that all of the Encumbrances

affecting or relating to the Purchased Assets are hereby expunged and discharged as against the Purchased Assets.

5. THIS COURT ORDERS AND DECLARES that upon the delivery of a receipt for payment in full by the Purchaser to each of the respective Additional Asset Purchasers, all of the Debtors' right, title and interest in and to each of the Additional Assets so purchased shall vest absolutely in the respective Additional Asset Purchaser, free and clear of and from any and all Claims, including, without limiting the generality of the foregoing, any and all Encumbrances, and, for greater certainty, this Court orders that all of the Encumbrances affecting or relating to the Additional Assets are hereby expunged and discharged as against the Additional Assets.

6. THIS COURT ORDERS that for the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Purchased Assets shall stand in the place and stead of the Purchased Assets, and that from and after the delivery of the Receiver's Certificate all Claims and Encumbrances shall attach to the net proceeds from the sale of the Purchased Assets with the same priority as they had with respect to the Purchased Assets immediately prior to the sale, as if the Purchased Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to the sale.

7. THIS COURT ORDERS AND DIRECTS the Receiver to file with the Court a copy of the Receiver's Certificate, forthwith after delivery thereof.

8. THIS COURT ORDERS that for the purposes of determining the nature and priority of Claims, the net proceeds from the sale of the Additional Assets shall stand in the place and stead of the Additional Assets, and that following the completion of the Sale, all Claims and Encumbrances shall attach to the net proceeds from the sale of the Additional Assets with the same priority as they had with respect to the Additional Assets immediately prior to the sale, as if the Additional Assets had not been sold and remained in the possession or control of the person having that possession or control immediately prior to the sale.

9. THIS COURT ORDERS that, notwithstanding:

- (a) the pendency of these proceedings;

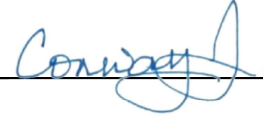
- (b) any applications for a bankruptcy order now or hereafter issued pursuant to the *Bankruptcy and Insolvency Act* (Canada) in respect of any of the Debtors and any bankruptcy order issued pursuant to any such applications; and
- (c) any assignment in bankruptcy made in respect of any of the Debtors;

the vesting of the Purchased Assets in the Purchaser, and of the Additional Assets in the Additional Asset Purchasers pursuant to this Order shall be binding on any trustee in bankruptcy that may be appointed in respect of the Debtors and shall not be void or voidable by creditors of the Debtors, nor shall it constitute nor be deemed to be a fraudulent preference, assignment, fraudulent conveyance, transfer at undervalue, or other reviewable transaction under the *Bankruptcy and Insolvency Act* (Canada) or any other applicable federal or provincial legislation, nor shall it constitute oppressive or unfairly prejudicial conduct pursuant to any applicable federal or provincial legislation.

10. THIS COURT HEREBY REQUESTS the aid and recognition of any court, tribunal, regulatory or administrative body having jurisdiction in Canada or in the United States to give effect to this Order and to assist the Receiver and its agents in carrying out the terms of this Order. All courts, tribunals, regulatory and administrative bodies are hereby respectfully requested to make such orders and to provide such assistance to the Receiver, as an officer of this Court, as may be necessary or desirable to give effect to this Order or to assist the Receiver and its agents in carrying out the terms of this Order.

11. THIS COURT ORDERS that the Receiver be at liberty, and is hereby authorized and empowered, to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Receiver is authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

12. THIS COURT ORDERS that this Order and all of its provisions are effective as of 12:01 a.m. Toronto time on the date of this Order, and this Order is enforceable without the need for entry and filing.

A handwritten signature in blue ink, appearing to read "Conway J.", is written over a horizontal line.

Justice, Ontario Superior Court of Justice
Commercial List

Schedule A – Form of Receiver’s Certificate

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.

Respondents

RECEIVER’S CERTIFICATE

RECITALS

A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (the "Court") dated May 26, 2023, Deloitte Restructuring Inc. was appointed as the receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors").

B. Pursuant to an Order of the Court dated [DATE], the Court approved the agreement of purchase and sale made as of August 4, 2023 (the "Sale Agreement") between the Receiver and Corporate Assets Inc. (the "Purchaser") and provided for the vesting in the Purchaser of the Debtor’s right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to the Purchaser of a certificate confirming (i) the payment by the Purchaser of the Purchase Price for the Purchased Assets; (ii) that the conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and (iii) the Transaction has been completed to the satisfaction of the Receiver.

C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Sale Agreement.

THE RECEIVER CERTIFIES the following:

1. The Purchaser has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement;
2. The conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and
3. The Transaction has been completed to the satisfaction of the Receiver.
4. This Certificate was delivered by the Receiver at _____ [TIME] on _____ [DATE].

Deloitte Restructuring Inc., in its capacity as Receiver of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc., and not in its personal or corporate capacity

Per: _____

Name:

Title:

Schedule B – Purchased Assets

All assets of the Debtor listed at Schedule “A” to the Sale Agreement, with the exception of the Additional Assets listed at Lots 2-76 and 2-77 at Schedule “A” to the Sale Agreement.

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

APPROVAL AND VESTING ORDER

HARRISON PENZA ^{LLP}
Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

Tel : (519) 679-9660
Fax: (519) 667-3362
Email: thogan@harrisonpensa.com
rdanter@harrisonpensa.com

Lawyers for the Receiver,
Deloitte Restructuring Inc.

APPENDIX "F"



Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE

)

FRIDAY, THE 25th

JUSTICE CONWAY

)

DAY OF AUGUST, 2023

)

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.

Respondents

ANCILLARY ORDER

THIS MOTION, made by Deloitte Restructuring Inc. in its capacity as the Court-appointed receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors"), appointed pursuant to the Order of the Honourable Justice Steele dated May 26, 2023, for an order:

1. That the time for service, filing and confirmation of the Notice of Motion and the Motion Record be abridged so that this motion is properly returnable today and hereby dispenses with further service and confirmation hereof;
2. Approving the Receiver's First Report to the Court dated August 15, 2023 (the "First Report") and the activities and conduct of the Receiver as detailed therein;

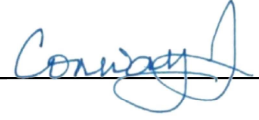
3. Approving the Receiver's Statement of Receipts and Disbursements for the period May 26, 2023 to July 31, 2023 as outlined in the First Report (the "Statement of Receipts and Disbursements");
4. Sealing the Confidential Appendices to the First Report (the "Confidential Appendices) until the completion of the AarKel Transaction and the Auction Transaction (as defined in the First Report), or until further Order of this Court;
5. Such further and other relief as counsel may request and this honourable court may permit,

was heard this day by judicial teleconference via Zoom at 330 University Avenue, Toronto, Ontario.

ON READING the First Report and the Appendices thereto, the Factum of the Receiver dated August 21, 2023, and on hearing the submissions of counsel for the Receiver and all other counsel and parties present, no one else appearing for any other person on the service list, although properly served as appears from the affidavit of service of Lindsay Ferguson sworn August 16, 2023, and the affidavits of service of Isabelle Stacey sworn August 21, 2023 and August 22, 2023, filed;

1. THIS COURT ORDERS that the time for service, filing and confirmation of the Notice of Motion and the Motion Record be and is abridged so that this motion is properly returnable today and hereby dispenses with further service and confirmation hereof.
2. THIS COURT ORDERS that the First Report, and the activities and conduct of the Receiver as detailed therein, be and are approved; provided, however, that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.
3. THIS COURT ORDERS that the Statement of Receipts and Disbursements be and is approved.

4. THIS COURT ORDERS that the Confidential Appendices be and are sealed until the completion of the AarKel Transaction and the Auction Transaction, or until further Order of this Court.

A handwritten signature in blue ink, appearing to read "Conway J.", is written over a horizontal line.

Justice, Ontario Superior Court of Justice

(Commercial List)

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

ANCILLARY ORDER

HARRISON PENZA ^{LLP}
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London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

Tel : (519) 679-9660

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Email: thogan@harrisonpensa.com

rdanter@harrisonpensa.com

Lawyers for the Receiver,
Deloitte Restructuring Inc.

APPENDIX "G"

Court File No. CV-23-00699663-00CL

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

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.**

Respondents

**APPLICATION UNDER SUBSECTIONS 47(1) AND 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**

RECEIVER'S CERTIFICATE

RECITALS

A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (the "**Court**") dated May 26, 2023, Deloitte Restructuring Inc. was appointed as the receiver and manager (in such capacities, the "**Receiver**"), without security, of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "**Debtors**").

B. Pursuant to an Order of the Court dated August 25, 2023, the Court approved the Asset Purchase Agreement made as of July 28, 2023 (the "**Sale Agreement**") between the Receiver and AarKel Testing Technologies Inc. (the "**Purchaser**") and provided for the vesting in the Purchaser of the Debtors' right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to the Purchaser of a certificate confirming (i) the payment by the Purchaser of the Purchase Price for the Purchased Assets in accordance with the terms of the Sale Agreement; (ii) that the conditions

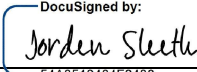
to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and (iii) the Transaction has been completed to the satisfaction of the Receiver.

C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Sale Agreement.

THE RECEIVER CERTIFIES the following:

1. The Purchaser has paid and the Receiver has received the Purchase Price for the Purchased Assets payable on the Closing Date pursuant to the Sale Agreement;
2. The conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and
3. The Transaction has been completed to the satisfaction of the Receiver.
4. This Certificate was delivered by the Receiver at 4:00 p.m. on September 6, 2023.

DELOITTE RESTRUCTURING INC., in its capacity as Receiver of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc., and not in its personal capacity

Per: 
Name: Jordan Sleeth
Title: Senior Vice President

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO
PLASTICS INC., AND MOLDCO HOLDINGS INC.**

Respondents

Court File No. CV-23-00699663-00CL

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

Proceedings commenced at Toronto

RECEIVER'S CERTIFICATE

AIRD & BERLIS LLP

Barristers & Solicitors
Brookfield Place
181 Bay Street, Suite 1800
Toronto, Ontario M5J 2T9

D. Robb English (LSO # 19862F)

Tel: (416) 865-4748
Email: renglish@airdberlis.com

Matilda Lici (LSO #79621D)

Tel: (416) 865-3428
Email: mlici@airdberlis.com

Lawyers for Deloitte Restructuring Inc.

APPENDIX "H"

RECEIVABLES AND INVENTORY PURCHASE AGREEMENT

THIS AGREEMENT is made as of September 22, 2023,

BETWEEN

AARKEL TESTING TECHNOLOGIES INC., a corporation
incorporated under the laws of the Province of Ontario
(the “**Purchaser**”),

- and -

DELOITTE RESTRUCTURING INC., solely in its capacity as
Court-appointed receiver of **INJECTION TECHNOLOGIES
INC.**, **MOLDCO PLASTICS INC.**, and **MOLDCO HOLDINGS
INC.**, and not in its personal or corporate capacity
(the “**Receiver**”)

WHEREAS on May 26, 2023, the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) granted an order (the “**Receivership Order**”) appointing Deloitte Restructuring Inc. as Receiver of the assets, undertakings and properties of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the “**Debtors**”);

AND WHEREAS pursuant to the Receivership Order, the Receiver is authorized to market and sell the assets, undertakings and properties of the Debtors; and

AND WHEREAS the Purchaser desires to purchase from the Receiver and the Receiver agrees to sell to the Purchaser (i) certain accounts receivable in respect of the Debtors’ tryouts, sampling and testing business, and (ii) certain raw material inventory, and as each is further described herein upon and subject to the terms and conditions set out in this Agreement;

NOW THEREFORE, in consideration of the covenants and agreements contained in this Agreement, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged by the parties hereto, the parties hereto agree as follows:

ARTICLE 1 - INTERPRETATION

1.01 Definitions

In this Agreement, unless something in the subject matter or context is inconsistent therewith:

“**Applicable Law**” means any applicable domestic or foreign law including any statute, law, regulation, code, ordinance, rule, restriction, subordinate legislation, by-law or treaty, as well as

the common law, and any applicable and enforceable rule, requirement, order, judgment, injunction, award or decree of a Governmental Authority;

“**Business Day**” means a day other than a Saturday, Sunday, statutory or civic holiday in Toronto, Ontario;

“**Closing Date**” means the date of this Agreement;

“**Customers**” means those parties and their legal successors and assigns that have an obligation to make a payment under the Purchased Receivables.

“**Governmental Authority**” means any domestic or foreign legislative, executive, judicial or administrative body or person having jurisdiction in the relevant circumstances;

“**Party**” or “**Parties**” mean either the Receiver or the Purchaser, as appropriate in the context, or both;

“**Person**” means any individual, corporation, limited liability company, partnership, firm, joint venture, association, joint-stock company, trust, unincorporated organization, Governmental Authority or other entity.

“**Tax Act**” means the *Income Tax Act* (Canada).

“**Taxes**” means all taxes, levies, imposts, duties, deductions, withholdings, assessments, fees or other charges imposed by any Governmental Authority, including any interest, additions to tax or penalties applicable to them.

“**Time of Closing**” means 3:00 p.m. (Toronto Time) on the Closing Date.

1.02 Headings

The division of this Agreement into Articles and Sections and the insertion of a table of contents and headings are for convenience of reference only and do not affect the construction or interpretation of this Agreement. The terms “hereof”, “herein”, “hereto”, “hereunder”, “hereby” and similar expressions refer to this Agreement and not to any particular Article, Section or other portion hereof. Unless something in the subject matter or context is inconsistent therewith, references herein to Articles, Sections and Schedules are to Articles and Sections of and Schedules to this Agreement.

1.03 Construction

This Agreement has been negotiated by each Party with the benefit of legal representation, and any rule of construction to the effect that any ambiguities are to be resolved against the drafting party does not apply to the construction or interpretation of this Agreement

1.04 Extended Meanings

In this Agreement words importing the singular number include the plural and vice versa, words importing any gender include all genders and words importing persons include individuals, corporations, limited and unlimited liability companies, general and limited partnerships, associations, trusts, unincorporated organizations, joint ventures and Governmental Authorities. The term “including” means “including without limiting the generality of the foregoing” and the term “third party” means any Person other than the Receiver and the Purchaser.

1.05 Capacity of Receiver

The Receiver, in executing this Agreement, is entering into this Agreement solely in its capacity as Court appointed receiver of the Debtors, and not in its personal or any other capacity. The Receiver shall have no personal or corporate liability of any kind whether in contract, tort or otherwise.

1.06 Statutory References

In this Agreement, unless something in the subject matter or context is inconsistent therewith or unless otherwise herein provided, a reference to any statute is to that statute as now enacted or as the same may from time to time be amended, re enacted or replaced and includes any regulations made thereunder.

1.07 Currency

All references to currency herein are to lawful money of Canada.

1.08 Schedules

The following are the Schedules attached to and incorporated in this Agreement by reference and deemed to be a part hereof:

- Schedule A** – Purchased Receivables
- Schedule B** – Purchased Inventory
- Schedule C** – Equipment re: Equipment Credit
- Schedule D** – Letter of Direction and Authorization

ARTICLE 2 - SALE AND PURCHASE

2.01 Assets to be Sold and Purchased

Upon and subject to the terms and conditions hereof, the Receiver will sell to the Purchaser and the Purchaser will purchase from the Receiver, as of and with effect from the Time of Closing, all of the right, title, benefit and interest of the Debtors in and to:

- (a) all accounts receivable set out in Schedule A (the “**Purchased Receivables**”); and

- (b) all supplies, resins, raw materials, spare parts and other raw inventories set out in Schedule B (the “**Purchased Inventory**”).

2.02 Purchase Price

The aggregate purchase price payable by the Purchaser to the Receiver for the Purchased Receivables and the Purchased Inventory on the Closing Date, excluding all applicable Taxes (such amount being hereinafter referred to as the “**Purchase Price**”), is an amount equal to the sum of the full value of the Purchased Receivables as set out in Schedule A (the “**Receivables Price**”) and the cost of the Purchased Inventory as set out in Schedule B.

2.03 Elections

(1) The Receiver and the Purchaser will on or before the Time of Closing jointly execute an election (if applicable), in the prescribed form and containing the prescribed information under section 22 of the Tax Act with respect to the sale of the Purchased Receivables and shall designate therein the Purchase Price allocated to the Purchased Receivables in Schedule A paid by Purchaser for the Purchased Receivables. The Receiver and the Purchaser shall each file such elections (and any documentation necessary or desirable to give effect thereto) forthwith after the execution thereof (and, in any event, with their respective Tax returns for the taxation year in which the Time of Closing occurs).

(2) The Receiver and the Purchaser will on or before the Time of Closing jointly execute an election (if applicable), in the prescribed form and containing the prescribed information, to have subsection 167(1.1) of the Excise Tax Act (Canada) apply to the sale and purchase of the Purchased Receivables and Purchased Inventory hereunder so that no Tax is payable in respect of such sale and purchase under Part IX of the Excise Tax Act (Canada). The Purchaser will file such election with the Minister of National Revenue within the time prescribed by the Excise Tax Act (Canada).

2.04 Transfer Taxes

(1) The Purchaser will be liable for and, subject to Section 2.03, will pay, or will cause to be paid, all transfer, value added, ad valorem, excise, sales, use, consumption, goods or services, harmonized sales, retail sales, social services, or other similar taxes or duties (collectively, “**Transfer Taxes**”) payable under any Applicable Law on or with respect to the sale and purchase of the Purchased Receivables under this Agreement. The Purchaser will prepare and file any affidavits or returns required in connection with the foregoing at its own cost and expense.

(2) The Purchaser shall indemnify and save harmless the Receiver and its employees, advisors and agents from all claims incurred, suffered or sustained as a result of a failure by the Purchaser:

- (a) to pay any Transfer Taxes payable by the Purchaser; and/or
- (b) to file any returns, certificates, filings, elections, notices or other documents required to be filed by the Purchaser with any federal, provincial or other

taxing authorities in connection with the conveyance or transfer of the Purchased Receivables.

2.05 Payment of Purchase Price

- (1) The Purchase Price will be satisfied by the Purchaser as follows:
 - (a) the Purchaser shall receive a credit to the aggregate Purchase Price in the amount of twenty seven thousand dollars (\$27,000.00) in consideration for its purchase from Corporate Assets Inc. of the equipment described in Schedule C attached hereto (the “**Equipment Credit**”), *provided* that the Purchaser provides evidence satisfactory to the Receiver that the subject equipment was purchased on or prior to the Closing Date;
 - (b) the Purchaser shall retain an amount equal to ten percent (10%) of the Receivables Price after applying the Equipment Credit (the “**Reconciliation Holdback**”) which Reconciliation Holdback, or any remaining portion thereof, shall be released to the Receiver following the Reconciliation Period (as defined in Section 2.05(3)).
 - (c) an amount equal to the aggregate Purchase Price, less the amount of the Equipment Credit and Reconciliation Holdback (the “**Closing Payment**”) shall be sent by the Purchaser by wire transfer at the Time of Closing in immediately available funds to an account specified by the Receiver; and
 - (d) the Purchaser shall be required to pay any bank fees or charges associated with any wire transfer;

(2) Before the Closing Date, the Receiver shall prepare and deliver to the Purchaser a statement signed by the Receiver setting out the Closing Payment after applying the Reconciliation Holdback and the Equipment Credit.

(3) Reporting & Reconciliation.

Beginning as of the Closing Date and until the day that is twenty (20) Business Days following the Closing Date (the “**Reconciliation Period**”), the Receiver shall prepare and deliver to the Purchaser weekly statements signed by the Receiver identifying, if applicable, any of the Customers that have made payments to the Receiver on account of any portion of the Purchased Receivables and the amount of such payments (the “**Post-Closing Payments**”).

If any of the Customers have made Post-Closing Payments to the Receiver, the amount of such payments, following the conclusion of the Reconciliation Period, shall be applied against Reconciliation Holdback for the benefit of the Purchaser. The surplus of the Reconciliation Holdback, if applicable, shall be payable by the Purchaser to the Receiver within two (2) Business Days following the conclusion of the Reconciliation Period in satisfaction of the Purchase Price (the “**Holdback Surplus**”).

In the event that any of the Customers continue to remit Post-Closing Payments to the Receiver following the conclusion of the Reconciliation Period and the payment of the Holdback Surplus, the Receiver hereby undertakes to remit all such Post-Closing Payments to the Purchaser within two (2) Business Days of receipt of the same.

All payments required to be made in connection with this Section 2.05(3) shall be made by wire transfer in immediately available funds to an account specified by the receiving party.

2.06 No Guarantee

The Purchaser acknowledges that this Agreement is not, and nothing herein contained and nothing done or caused to be done by the Receiver pursuant to this Agreement shall be deemed to constitute, a direct or indirect guarantee by the Receiver of payment to the Purchaser of any part of the Purchased Receivables or any other obligation, indebtedness or liability of any kind or character whatsoever owed by the Customers in connection with Purchased Receivables. For greater certainty, after the Time of Closing, the Purchaser shall not be entitled to recover from the Receiver any amounts owing from any Customers that become doubtful accounts.

ARTICLE 3 - REPRESENTATIONS AND WARRANTIES

3.01 Receiver's Representations and Warranties

The Receiver represents and warrants to the Purchaser that, as at the date hereof and as of the Closing Date:

- (a) the Receiver has the power, authority and right to enter into and deliver this Agreement and to carry out its obligations hereunder;
- (b) this Agreement constitutes a valid and legally binding obligation of the Receiver, enforceable against the Receiver in accordance with its terms;
- (c) the Receiver is not a non resident of Canada within the meaning of section 116 of the Tax Act.

3.02 Purchaser's Representations and Warranties

The Purchaser represents and warrants to the Receiver that:

- (a) the Purchaser is a corporation duly incorporated, organized and existing under the laws of the Province of Ontario;
- (b) the Purchaser has the power, authority and right to enter into and deliver this Agreement and to carry out its obligations hereunder;
- (c) this Agreement constitutes a valid and legally binding obligation of the Purchaser, enforceable against the Purchaser in accordance with its terms;

- (d) the Purchaser has taken all necessary corporate action to authorize the entering into and performance by it of this Agreement and completion of the transactions contemplated herein and the entering into of this Agreement in completion of the transactions contemplated herein will not breach its constating documents, any agreement binding on the Purchaser, or Applicable Laws relating to the Purchaser;
- (e) there are no orders of or proceedings before or pending before any Governmental Authority, or threatened to be brought by or before any Governmental Authority by or against the Purchaser affecting the legality, validity or enforceability of this Agreement or the consummation of the transactions contemplated hereby by the Purchaser;
- (f) no authorizations, consents or approvals of, or filing with or notice to, any Governmental Authority is required in connection with the execution, delivery or performance of this Agreement;
- (g) no consent, waiver, authorization or approval of any Person and no declaration to or filing or registration with any Governmental Authority is required in connection with the execution and delivery by the Purchaser of this Agreement;
- (h) the Purchaser has available and at the Time of Closing will have, sufficient funding to enable the Purchaser to consummate the purchase of the Purchased Receivables and the Purchased Inventory on the terms set forth herein and otherwise to perform all of the Purchaser's obligations under this Agreement; and
- (i) the Purchaser is not a non resident of Canada within the meaning of section 116 of the Tax Act.

ARTICLE 4 - CONDITIONS AND TERMINATION

4.01 Conditions for the Benefit of the Purchaser

The sale by the Receiver and the purchase by the Purchaser of the Purchased Receivables and the Purchased Inventory is subject to the following conditions, which are for the exclusive benefit of the Purchaser and which are to be performed or complied with at or prior to the Time of Closing:

- (a) the representations and warranties of the Receiver set forth in this Agreement will be true and correct in all material respects at the Time of Closing with the same force and effect as if made at and as of such time;
- (b) the Receiver will have performed or complied in all material respects with all of the obligations and covenants of this Agreement to be performed or complied with by the Receiver at or prior to the Time of Closing; and
- (c) to the best of the Receiver's knowledge, no action or proceeding in Canada will be pending by any third party to enjoin or prohibit the sale and purchase of the Purchased Receivables.

4.02 Conditions for the Benefit of the Receiver

The sale by the Receiver and the purchase by the Purchaser of the Purchased Receivables and the Purchased Inventory is subject to the following conditions, which are for the exclusive benefit of the Receiver and which are to be performed or complied with at or prior to the Time of Closing:

- (a) the representations and warranties of the Purchaser set forth in this Agreement will be true and correct in all material respects at the Time of Closing with the same force and effect as if made at and as of such time;
- (b) the Purchaser will have performed or complied in all material respects with all of the obligations and covenants of this Agreement to be performed or complied with by the Purchaser at or prior to the Time of Closing; and
- (c) no action or proceeding in Canada will be pending by any third party to enjoin or prohibit the purchase and sale of the Purchased Receivables.

4.03 Waiver of Condition

The Purchaser, in the case of a condition set out in Section 4.01, and the Receiver, in the case of a condition set out in Section 4.02, will have the exclusive right to waive the performance or compliance of such condition in whole or in part and on such terms as may be agreed upon without prejudice to any of its rights in the event of non performance of or non compliance with any other condition in whole or in part. Any such waiver will not constitute a waiver of any other conditions in favour of the waiving party. Such waiving party will retain the right to complete the purchase and sale of the Purchased Receivables and the Purchased Inventory herein contemplated.

4.04 Termination

This Agreement may be terminated, by notice given prior to or on the Closing Date:

- (a) by the Receiver or the Purchaser if a material breach of any representation, warranty, covenant, obligation or other provision of this Agreement has been committed by the other party and such breach has not been waived or cured within five days following the date on which the non breaching party notifies the other party of such breach; and
- (b) by written agreement of the Purchaser and the Receiver.

4.05 Effect of Termination

Each party's right of termination under Section 4.04 is in addition to any other rights it may have under this Agreement or otherwise, and the exercise of a right of termination will not be an election of remedies. If this Agreement is terminated pursuant to Section 4.04, all further obligations of the parties under this Agreement will terminate, except that the obligations in Section 2.05 will survive; provided, however, that if this Agreement is terminated by a party because of a material breach of a representation or warranty, covenant, obligation or other

provision of this Agreement by the other party or because one or more of the conditions to the terminating party's obligations under this Agreement is not satisfied as a result of the other party's failure to comply with its obligations under this Agreement, the terminating party's right to pursue all legal remedies with respect to such breach will survive such termination unimpaired.

ARTICLE 5 - CLOSING ARRANGEMENTS

5.01 Closing

Subject to the terms and conditions of this Agreement, the sale and purchase of the Purchased Receivables and the Purchased Inventory will be completed electronically on the Closing Date, at the Time of Closing, or via such other place as may be agreed upon in writing by the Parties.

5.02 Receiver's Closing Deliveries

On or before the Time of Closing, the Receiver will deliver or cause to be delivered to the Purchaser the following:

- (a) if available, the tax elections as contemplated by Section 2.03 executed by the Receiver;
- (b) a bill of sale and general conveyance of the Purchased Receivables duly executed by the Receiver;
- (c) a bill of sale and general conveyance of the Purchased Inventory duly executed by the Receiver;
- (d) a letter of direction and authorization in the form attached as Schedule D hereto authorizing the Customers to remit payment to the Purchaser; and
- (e) such other documents or instruments as contemplated or required to be delivered by the Receiver pursuant to this Agreement, all of which shall be in form and substance satisfactory to the parties, acting reasonably.

5.03 Purchaser's Closing Deliveries

On or before the Time of Closing, the Purchaser will deliver or cause to be delivered to the Receiver the following:

- (a) payment of the Purchase Price to the Receiver as contemplated by Section 2.05.
- (b) if available, the tax elections as contemplated by Section 2.03 executed by the Purchaser; and
- (c) such other documents or instruments as contemplated or required to be delivered by the Purchaser pursuant to this Agreement, all of which shall be in form and substance satisfactory to the parties, acting reasonably.

ARTICLE 6 - SURVIVAL

6.01 Survival

No covenants, representations and warranties of each party contained in this Agreement will survive the completion of the sale and purchase of the Purchased Receivables and the Purchased Inventory hereunder, except for the covenants that by their terms are to be satisfied or survive after the Time of Closing (including without limitation Sections 2.04, 7.04 and 7.05), which covenants will continue in full force and effect in accordance with their terms.

ARTICLE 7 - GENERAL

7.01 Legal Advice

The Parties have each consulted with and been advised by their own solicitors before entering into this Agreement, have read same, and know the contents thereof.

7.02 Further Assurances

Each of the Receiver and the Purchaser will from time to time at the request and expense of the other execute and deliver all such further documents and instruments and do all acts and things as the other party may, either before or after the Closing Date, reasonably require to effectively carry out or better evidence or perfect the full intent and meaning of this Agreement.

7.03 Time of the Essence

Time is of the essence in this Agreement.

7.04 Fees, Commissions and Other Costs and Expenses

Each of the Receiver and the Purchaser shall be solely responsible for their respective legal and accounting costs and expenses and any real estate or other commissions incurred in connection with the preparation, execution and delivery of this Agreement and all documents and instruments executed pursuant to this Agreement and any other costs and expenses whatsoever and howsoever incurred and will indemnify and save harmless the other from and against any claim resulting from any broker's, finder's or placement fee or commission alleged to have been incurred as a result of any action by it in connection with the transactions under this Agreement.

7.05 Public Announcements

Except as required by Applicable Law, no public announcement or press release concerning the sale and purchase of the Purchased Receivables and the Purchased Inventory may be made by the Receiver or the Purchaser without the prior consent and joint approval of the Receiver and the Purchaser.

7.06 Benefit of the Agreement

This Agreement will enure to the benefit of and be binding upon the Parties and their respective successors and permitted assigns.

7.07 Entire Agreement

This Agreement constitutes the entire agreement between the parties with respect to the subject matter hereof and such agreements cancel and supersede any prior understandings and agreements between the parties with respect thereto. There are no representations, warranties, terms, conditions, undertakings or collateral agreements, express, implied or statutory, between the parties other than as expressly set forth in this Agreement (including the agreements contemplated hereby).

7.08 Amendments and Waivers

No amendment to this Agreement will be valid or binding unless set forth in writing and duly executed by both of the parties. No waiver of any breach of any provision of this Agreement will be effective or binding unless made in writing and signed by the party purporting to give the same and, unless otherwise provided, will be limited to the specific breach waived.

7.09 Assignment

This Agreement may not be assigned by any Party hereto without the prior written consent of the other Party hereto, which consent may be arbitrarily withheld.

7.10 Notices

Any demand, notice or other communication required or permitted to be given in connection with this Agreement must be in writing and delivered by courier or email as follows:

To the Receiver:

Deloitte Restructuring Inc.
8 Adelaide Street West, Suite 200
Toronto, ON, M5H 0A9

Attention: Jorden Sleeth
Email: jsleeth@deloitte.ca

With copies to (which will not constitute notice):

Aird & Berlis LLP
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

Attention: D. Robb English
Email: renglish@airdberlis.com

To the Purchaser:

AarKel Testing Technologies Inc.
2800-130 Adelaide Street West
Toronto, ON M5H 3P5

Attention: Larry Delaey and Mary Van Santvoort
Email: larryd@aarkel.com and mary@zynik.com

With copies to (which will not constitute notice):

Loopstra Nixon LLP
2800-130 Adelaide Street West
Toronto, ON M5H 3P5

Attention: Eric Feige, Julian Papes and Gary Fung
Email: efeige@ln.law, jpapes@ln.law and gfung@ln.law

or to such other street address, individual or electronic communication number or address as may be designated by notice given by either party to the other. Any demand, notice or other communication given by personal delivery will be conclusively deemed to have been given on the day of actual delivery thereof and, if given by electronic communication, on the day of transmittal thereof if given during the normal business hours of the recipient and on the Business Day during which such normal business hours next occur if not given during such hours on any day.

7.11 Remedies Cumulative

The right and remedies of the parties under this Agreement are cumulative and are in addition to, and not in substitution for, any other rights and remedies available at law or in equity or otherwise. No single or partial exercise by a party of any right or remedy precludes or otherwise affects the exercise of any other right or remedy to which that party may be entitled.

7.12 No Third Party Beneficiary

This Agreement is solely for the benefit of the Parties and no third party accrues any benefit, claim or right of any kind pursuant to, under, by or through this Agreement.

7.13 Governing Law

This Agreement is governed by and will be construed in accordance with the laws of the Province of Ontario and the laws of Canada applicable therein, and the Parties hereby attorn to the jurisdiction of the Court.

7.14 Attornment

For the purpose of all legal proceedings this Agreement will be deemed to have been performed in the Province of Ontario and the courts of the Province of Ontario will have

jurisdiction to entertain any action arising under this Agreement. The Receiver and the Purchaser each attorns to the jurisdiction of the courts of the Province of Ontario.

7.15 Severability

If, in any jurisdiction, any provision of this Agreement or its application to any Party or circumstance is restricted, prohibited, or unenforceable, that provision will, as to that jurisdiction, be ineffective only to the extent of that restriction, prohibition, or unenforceability without invalidating the remaining provisions of this Agreement, without affecting the validity or enforceability of that provision in any other jurisdiction and, if applicable, without affecting its application to the other Parties or circumstances.

7.16 Counterparts

This Agreement may be executed in any number of counterparts, each of which will be deemed to be an original and all of which taken together will be deemed to constitute one and the same instrument.

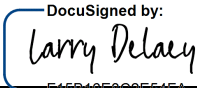
7.17 Electronic Execution

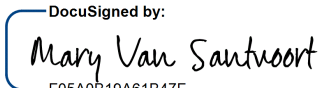
Delivery of an executed signature page to this Agreement by any party by electronic transmission will be as effective as delivery of a manually executed copy of this Agreement by such party.

[The balance of this page has been intentionally left blank]

IN WITNESS WHEREOF the parties have executed this Agreement as of the date first above written.

**AARKEL TESTING TECHNOLOGIES
INC.**

Per: 
Name: Larry Delacy
Title: President

Per: 
Name: Mary Van Santvoort
Title: Secretary-Treasurer
We have authority to bind the Corporation.

**DELOITTE RESTRUCTURING INC., solely
in its capacity as Court-appointed receiver of
INJECTION TECHNOLOGIES INC.,
MOLDCO PLASTICS INC., and MOLDCO
HOLDINGS INC., and not in its personal or
corporate capacity**

Per: _____
Name: Jordan Sleeth, CPA, CA, CIRP, LIT
Title: Senior Vice-President

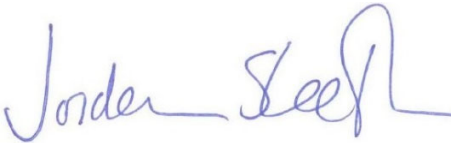
IN WITNESS WHEREOF the parties have executed this Agreement as of the date first above written.

**AARKEL TESTING TECHNOLOGIES
INC.**

Per: _____
Name: Larry Delacey
Title: President

Per: _____
Name: Mary Van Santvoort
Title: Secretary-Treasurer
We have authority to bind the Corporation.

**DELOITTE RESTRUCTURING INC., solely
in its capacity as Court-appointed receiver of
INJECTION TECHNOLOGIES INC.,
MOLDCO PLASTICS INC., and MOLDCO
HOLDINGS INC., and not in its personal or
corporate capacity**

Per: 

Name: Jorden Sleeth, CPA, CA, CIRP, LIT
Title: Senior Vice-President

SCHEDULE A
PURCHASED RECEIVABLES

See attached.

Schedule A

Deloitte Restructuring Inc. Receiver of
Customer Aged Detail As at 09/05/2023

Source	Date	Terms	Transaction Type	Currency Code	Total	Current	31 to 60	61 to 90	91+
AARKEL TOOL & DIE INC.									
31339	07/04/2023	Net 60	Invoice		1,355.44	0.00	0.00	1,355.44	0.00
31347	07/05/2023	Net 60	Invoice		3,938.05	0.00	0.00	3,938.05	0.00
31352	07/06/2023	Net 60	Invoice		2,716.52	0.00	0.00	2,716.52	0.00
31363	07/10/2023	Net 60	Invoice		1,958.86	0.00	1,958.86	0.00	0.00
31364	07/10/2023	Net 60	Invoice		1,740.20	0.00	1,740.20	0.00	0.00
31389	07/13/2023	Net 60	Invoice		518.67	0.00	518.67	0.00	0.00
31390	07/13/2023	Net 60	Invoice		5,373.15	0.00	5,373.15	0.00	0.00
31391	07/13/2023	Net 60	Invoice		4,118.85	0.00	4,118.85	0.00	0.00
31413	07/18/2023	Net 60	Invoice		3,263.44	0.00	3,263.44	0.00	0.00
31427	07/20/2023	Net 60	Invoice		1,680.88	0.00	1,680.88	0.00	0.00
31428	07/20/2023	Net 60	Invoice		1,317.58	0.00	1,317.58	0.00	0.00
31429	07/20/2023	Net 60	Invoice		892.70	0.00	892.70	0.00	0.00
31452	07/25/2023	Net 60	Invoice		1,939.08	0.00	1,939.08	0.00	0.00
31453	07/25/2023	Net 60	Invoice		2,639.68	0.00	2,639.68	0.00	0.00
31454	07/25/2023	Net 60	Invoice		3,692.84	0.00	3,692.84	0.00	0.00
31462	07/26/2023	Net 60	Invoice		1,859.98	0.00	1,859.98	0.00	0.00
31463	07/26/2023	Net 60	Invoice		1,254.30	0.00	1,254.30	0.00	0.00
31486	07/28/2023	Net 60	Invoice		904.00	0.00	904.00	0.00	0.00
31487	07/28/2023	Net 60	Invoice		1,853.20	0.00	1,853.20	0.00	0.00
31488	07/28/2023	Net 60	Invoice		2,457.75	0.00	2,457.75	0.00	0.00
31500	07/31/2023	Net 60	Invoice		2,678.10	0.00	2,678.10	0.00	0.00
31515	08/02/2023	Net 60	Invoice		2,377.52	0.00	2,377.52	0.00	0.00
31525	08/03/2023	Net 60	Invoice		4,006.98	0.00	4,006.98	0.00	0.00
31546	08/09/2023	Net 60	Invoice		3,689.45	3,689.45	0.00	0.00	0.00
31578	08/15/2023	Net 60	Invoice		1,757.15	1,757.15	0.00	0.00	0.00
31579	08/15/2023	Net 60	Invoice		3,401.30	3,401.30	0.00	0.00	0.00
31580	08/15/2023	Net 60	Invoice		4,604.75	4,604.75	0.00	0.00	0.00
31592	08/17/2023	Net 60	Invoice		1,344.70	1,344.70	0.00	0.00	0.00
31602	08/18/2023	Net 60	Invoice		1,203.45	1,203.45	0.00	0.00	0.00
31603	08/18/2023	Net 60	Invoice		2,362.27	2,362.27	0.00	0.00	0.00
31613	08/21/2023	Net 60	Invoice		1,481.43	1,481.43	0.00	0.00	0.00
31614	08/21/2023	Net 60	Invoice		1,827.21	1,827.21	0.00	0.00	0.00
31615	08/21/2023	Net 60	Invoice		2,121.01	2,121.01	0.00	0.00	0.00
31626	08/23/2023	Net 60	Invoice		1,413.63	1,413.63	0.00	0.00	0.00
31627	08/23/2023	Net 60	Invoice		917.56	917.56	0.00	0.00	0.00
31636	08/24/2023	Net 60	Invoice		1,901.79	1,901.79	0.00	0.00	0.00
31645	08/25/2023	Net 60	Invoice		3,214.85	3,214.85	0.00	0.00	0.00
31697	09/05/2023	Net 60	Invoice		4,039.75	4,039.75	0.00	0.00	0.00
Total outstanding:					89,818.07	35,280.30	46,527.76	8,010.01	0.00
ABSOLUTE TOOL TECHNOLOGIES INC.									
31242	06/14/2023	Net 60	Invoice		11,783.08	0.00	0.00	11,783.08	0.00
31273	06/20/2023	Net 60	Invoice		10,068.30	0.00	0.00	10,068.30	0.00
31501	07/31/2023	Net 60	Invoice		461.61	0.00	461.61	0.00	0.00
31502	07/31/2023	Net 60	Invoice		7,582.30	0.00	7,582.30	0.00	0.00
31585	08/16/2023	Net 60	Invoice		11,670.64	11,670.64	0.00	0.00	0.00
31670	08/30/2023	Net 60	Invoice		11,936.76	11,936.76	0.00	0.00	0.00
31679	08/31/2023	Net 60	Invoice		5,446.60	5,446.60	0.00	0.00	0.00
Total outstanding:					58,949.29	29,054.00	8,043.91	21,851.38	0.00
ARLEN TOOL & MACHINING									
31532	08/04/2023	Net 60	Invoice		5,392.36	0.00	5,392.36	0.00	0.00
Total outstanding:					5,392.36	0.00	5,392.36	0.00	0.00
ARLEN TOOL CO.									
31516	08/02/2023	Net 60	Invoice		1,838.51	0.00	1,838.51	0.00	0.00
31554	08/09/2023	Net 60	Invoice		514.72	514.72	0.00	0.00	0.00
31593	08/17/2023	Net 60	Invoice		1,782.01	1,782.01	0.00	0.00	0.00
31659	08/29/2023	Net 60	Invoice		2,016.49	2,016.49	0.00	0.00	0.00
31660	08/29/2023	Net 60	Invoice		1,971.29	1,971.29	0.00	0.00	0.00
31680	08/31/2023	Net 60	Invoice		2,408.60	2,408.60	0.00	0.00	0.00
Total outstanding:					10,531.62	8,693.11	1,838.51	0.00	0.00
BASIC TOOL INC.									
31250	06/14/2023	Net 60	Invoice		2,564.54	0.00	0.00	2,564.54	0.00
31251	06/14/2023	Net 60	Invoice		996.66	0.00	0.00	996.66	0.00

31370	07/11/2023	Net 60	Invoice	1,297.24	0.00	1,297.24	0.00	0.00	
31563	08/11/2023	Net 60	Invoice	2,115.93	2,115.93	0.00	0.00	0.00	
31564	08/11/2023	Net 60	Invoice	802.30	802.30	0.00	0.00	0.00	
31629	08/23/2023	Net 60	Invoice	3,437.46	3,437.46	0.00	0.00	0.00	
Total outstanding:				11,214.13	6,355.69	1,297.24	3,561.20	0.00	
CALIBUR TOOL & MOLD INC									
31414	07/18/2023		Invoice	1,988.80	0.00	1,988.80	0.00	0.00	
31473	07/27/2023		Invoice	961.63	0.00	961.63	0.00	0.00	
31533	08/04/2023		Invoice	1,720.99	0.00	1,720.99	0.00	0.00	
Total outstanding:				4,671.42	0.00	4,671.42	0.00	0.00	
CANAM TOOL									
31474	07/27/2023	Net 60	Invoice	2,799.01	0.00	2,799.01	0.00	0.00	
31534	08/04/2023	Net 60	Invoice	939.03	0.00	939.03	0.00	0.00	
31630	08/23/2023	Net 60	Invoice	2,602.39	2,602.39	0.00	0.00	0.00	
31691	09/01/2023	Net 60	Invoice	1,215.88	1,215.88	0.00	0.00	0.00	
Total outstanding:				7,556.31	3,818.27	3,738.04	0.00	0.00	
CREST MOLD TECHNOLOGY INC.									
31646	08/25/2023	Net 60	Invoice	1,350.35	1,350.35	0.00	0.00	0.00	
31647	08/25/2023	Net 60	Invoice	1,192.15	1,192.15	0.00	0.00	0.00	
31661	08/29/2023	Net 60	Invoice	4,704.76	4,704.76	0.00	0.00	0.00	
31662	08/29/2023	Net 60	Invoice	2,826.13	2,826.13	0.00	0.00	0.00	
31671	08/30/2023	Net 60	Invoice	3,514.30	3,514.30	0.00	0.00	0.00	
31672	08/30/2023	Net 60	Invoice	2,419.33	2,419.33	0.00	0.00	0.00	
31673	08/30/2023	Net 60	Invoice	1,582.00	1,582.00	0.00	0.00	0.00	
31681	08/31/2023	Net 60	Invoice	2,073.55	2,073.55	0.00	0.00	0.00	
31682	08/31/2023	Net 60	Invoice	2,416.51	2,416.51	0.00	0.00	0.00	
Total outstanding:				22,079.08	22,079.08	0.00	0.00	0.00	
DIXON TOOL CO LTD.									
31380	07/12/2023	Net 60	Invoice	1,093.84	0.00	1,093.84	0.00	0.00	
31437	07/21/2023	Net 60	Invoice	998.92	0.00	998.92	0.00	0.00	
31465	07/26/2023	Net 60	Invoice	952.59	0.00	952.59	0.00	0.00	
31503	07/31/2023	Net 60	Invoice	838.46	0.00	838.46	0.00	0.00	
31547	08/09/2023	Net 60	Invoice	485.90	485.90	0.00	0.00	0.00	
31565	08/11/2023	Net 60	Invoice	1,020.39	1,020.39	0.00	0.00	0.00	
31582	08/15/2023	Net 60	Invoice	1,270.12	1,270.12	0.00	0.00	0.00	
31619	08/22/2023	Net 60	Invoice	762.75	762.75	0.00	0.00	0.00	
31638	08/24/2023	Net 60	Invoice	1,125.48	1,125.48	0.00	0.00	0.00	
31683	08/31/2023	Net 60	Invoice	785.35	785.35	0.00	0.00	0.00	
31684	08/31/2023	Net 60	Invoice	940.16	940.16	0.00	0.00	0.00	
Total outstanding:				10,273.96	6,390.15	3,883.81	0.00	0.00	
INTEGRITY TOOL & MOLD, INC.									
31342	07/04/2023	Net 60	Invoice	3,702.45	0.00	0.00	3,702.45	0.00	
31350	07/05/2023	Net 60	Invoice	3,401.30	0.00	0.00	3,401.30	0.00	
31354	07/06/2023	Net 60	Invoice	6,195.23	0.00	0.00	6,195.23	0.00	
31360	07/07/2023	Net 60	Invoice	1,655.45	0.00	0.00	1,655.45	0.00	
31381	07/12/2023	Net 60	Invoice	2,830.65	0.00	2,830.65	0.00	0.00	
31396	07/13/2023	Net 60	Invoice	3,244.23	0.00	3,244.23	0.00	0.00	
31397	07/13/2023	Net 60	Invoice	3,021.62	0.00	3,021.62	0.00	0.00	
31398	07/13/2023	Net 60	Invoice	3,105.81	0.00	3,105.81	0.00	0.00	
31411	07/17/2023	Net 60	Invoice	878.58	0.00	878.58	0.00	0.00	
31432	07/20/2023	Net 60	Invoice	1,673.53	0.00	1,673.53	0.00	0.00	
31438	07/21/2023	Net 60	Invoice	4,849.96	0.00	4,849.96	0.00	0.00	
31439	07/21/2023	Net 60	Invoice	1,022.65	0.00	1,022.65	0.00	0.00	
31443	07/24/2023	Net 60	Invoice	3,032.92	0.00	3,032.92	0.00	0.00	
31444	07/24/2023	Net 60	Invoice	3,686.06	0.00	3,686.06	0.00	0.00	
31445	07/24/2023	Net 60	Invoice	936.77	0.00	936.77	0.00	0.00	
31446	07/24/2023	Net 60	Invoice	927.73	0.00	927.73	0.00	0.00	
31447	07/24/2023	Net 60	Invoice	1,125.48	0.00	1,125.48	0.00	0.00	
31448	07/24/2023	Net 60	Invoice	1,145.82	0.00	1,145.82	0.00	0.00	
31455	07/25/2023	Net 60	Invoice	2,283.73	0.00	2,283.73	0.00	0.00	
31466	07/26/2023	Net 60	Invoice	1,502.34	0.00	1,502.34	0.00	0.00	
31477	07/27/2023	Net 60	Invoice	1,637.94	0.00	1,637.94	0.00	0.00	
31478	07/27/2023	Net 60	Invoice	1,507.99	0.00	1,507.99	0.00	0.00	
31479	07/27/2023	Net 60	Invoice	1,099.49	0.00	1,099.49	0.00	0.00	
31480	07/27/2023	Net 60	Invoice	630.54	0.00	630.54	0.00	0.00	

31495	07/28/2023	Net 60	Invoice	2,815.96	0.00	2,815.96	0.00	0.00
31496	07/28/2023	Net 60	Invoice	949.20	0.00	949.20	0.00	0.00
31497	07/28/2023	Net 60	Invoice	1,151.47	0.00	1,151.47	0.00	0.00
31498	07/28/2023	Net 60	Invoice	1,135.65	0.00	1,135.65	0.00	0.00
31499	07/28/2023	Net 60	Invoice	1,010.22	0.00	1,010.22	0.00	0.00
31539	08/08/2023	Net 60	Invoice	1,330.01	0.00	1,330.01	0.00	0.00
31540	08/08/2023	Net 60	Invoice	1,318.71	0.00	1,318.71	0.00	0.00
31541	08/08/2023	Net 60	Invoice	1,150.34	0.00	1,150.34	0.00	0.00
31555	08/10/2023	Net 60	Invoice	1,969.59	1,969.59	0.00	0.00	0.00
31556	08/10/2023	Net 60	Invoice	3,203.55	3,203.55	0.00	0.00	0.00
31557	08/10/2023	Net 60	Invoice	2,708.61	2,708.61	0.00	0.00	0.00
31566	08/11/2023	Net 60	Invoice	2,566.80	2,566.80	0.00	0.00	0.00
31573	08/14/2023	Net 60	Invoice	1,240.74	1,240.74	0.00	0.00	0.00
31583	08/15/2023	Net 60	Invoice	4,348.24	4,348.24	0.00	0.00	0.00
31586	08/16/2023	Net 60	Invoice	5,265.80	5,265.80	0.00	0.00	0.00
31595	08/17/2023	Net 60	Invoice	1,966.77	1,966.77	0.00	0.00	0.00
31596	08/17/2023	Net 60	Invoice	3,326.72	3,326.72	0.00	0.00	0.00
31616	08/21/2023	Net 60	Invoice	1,522.68	1,522.68	0.00	0.00	0.00
31648	08/25/2023	Net 60	Invoice	4,249.93	4,249.93	0.00	0.00	0.00
31649	08/25/2023	Net 60	Invoice	3,490.57	3,490.57	0.00	0.00	0.00
31654	08/28/2023	Net 60	Invoice	1,825.52	1,825.52	0.00	0.00	0.00
31655	08/28/2023	Net 60	Invoice	2,318.76	2,318.76	0.00	0.00	0.00
31656	08/28/2023	Net 60	Invoice	1,959.99	1,959.99	0.00	0.00	0.00
31663	08/29/2023	Net 60	Invoice	1,838.51	1,838.51	0.00	0.00	0.00
31674	08/30/2023	Net 60	Invoice	893.83	893.83	0.00	0.00	0.00
31675	08/30/2023	Net 60	Invoice	2,144.18	2,144.18	0.00	0.00	0.00
316703	09/05/2023	Net 60	Invoice	4,388.36	4,388.36	0.00	0.00	0.00

Total outstanding: 117,188.98 51,229.15 51,005.40 14,954.43 0.00

LAMKO TOOL & MOLD

31361	07/07/2023	Net 60	Invoice	2,487.70	0.00	0.00	2,487.70	0.00
31372	07/11/2023	Net 60	Invoice	3,179.82	0.00	3,179.82	0.00	0.00
31405	07/14/2023	Net 60	Invoice	2,535.72	0.00	2,535.72	0.00	0.00
31412	07/17/2023	Net 60	Invoice	2,716.52	0.00	2,716.52	0.00	0.00
31426	07/19/2023	Net 60	Invoice	18,321.82	0.00	18,321.82	0.00	0.00
31548	08/09/2023	Net 60	Invoice	4,891.21	4,891.21	0.00	0.00	0.00
31604	08/18/2023	Net 60	Invoice	794.96	794.96	0.00	0.00	0.00

Total outstanding: 34,927.75 5,686.17 26,753.88 2,487.70 0.00

MEGA MOLD INTERNATIONAL INC.

31288	06/22/2023	Net 60	Invoice	2,070.16	0.00	0.00	2,070.16	0.00
31289	06/22/2023	Net 60	Invoice	1,898.40	0.00	0.00	1,898.40	0.00
31351	07/05/2023	Net 60	Invoice	1,928.91	0.00	0.00	1,928.91	0.00
31355	07/06/2023	Net 60	Invoice	871.23	0.00	0.00	871.23	0.00
31362	07/07/2023	Net 60	Invoice	1,635.11	0.00	0.00	1,635.11	0.00
31382	07/12/2023	Net 60	Invoice	1,032.82	0.00	1,032.82	0.00	0.00
31383	07/12/2023	Net 60	Invoice	751.45	0.00	751.45	0.00	0.00
31384	07/12/2023	Net 60	Invoice	1,285.94	0.00	1,285.94	0.00	0.00
31422	07/19/2023	Net 60	Invoice	1,639.63	0.00	1,639.63	0.00	0.00
31423	07/19/2023	Net 60	Invoice	1,469.00	0.00	1,469.00	0.00	0.00
31456	07/25/2023	Net 60	Invoice	1,024.91	0.00	1,024.91	0.00	0.00
31457	07/25/2023	Net 60	Invoice	1,248.65	0.00	1,248.65	0.00	0.00
31467	07/26/2023	Net 60	Invoice	2,234.01	0.00	2,234.01	0.00	0.00
31481	07/27/2023	Net 60	Invoice	983.10	0.00	983.10	0.00	0.00
31507	08/01/2023	Net 60	Invoice	805.69	0.00	805.69	0.00	0.00
31508	08/01/2023	Net 60	Invoice	1,219.27	0.00	1,219.27	0.00	0.00
31527	08/03/2023	Net 60	Invoice	1,519.85	0.00	1,519.85	0.00	0.00
31528	08/03/2023	Net 60	Invoice	648.62	0.00	648.62	0.00	0.00
31542	08/08/2023	Net 60	Invoice	2,926.70	0.00	2,926.70	0.00	0.00
31558	08/10/2023	Net 60	Invoice	545.79	545.79	0.00	0.00	0.00
31574	08/14/2023	Net 60	Invoice	2,511.99	2,511.99	0.00	0.00	0.00
31575	08/14/2023	Net 60	Invoice	961.07	961.07	0.00	0.00	0.00
31605	08/18/2023	Net 60	Invoice	682.52	682.52	0.00	0.00	0.00
31632	08/23/2023	Net 60	Invoice	1,293.85	1,293.85	0.00	0.00	0.00
31664	08/29/2023	Net 60	Invoice	960.50	960.50	0.00	0.00	0.00
31665	08/29/2023	Net 60	Invoice	852.02	852.02	0.00	0.00	0.00
31699	09/05/2023	Net 60	Invoice	839.59	839.59	0.00	0.00	0.00

Total outstanding: 35,840.78 8,647.33 18,789.64 8,403.81 0.00

MOLD-CAM

31676	08/30/2023	Net 60	Invoice	1,050.90	1,050.90	0.00	0.00	0.00
31677	08/30/2023	Net 60	Invoice	614.72	614.72	0.00	0.00	0.00
31685	08/31/2023	Net 60	Invoice	1,049.21	1,049.21	0.00	0.00	0.00

Total outstanding:					2,714.83	2,714.83	0.00	0.00	0.00
NEOVISION TECHNOLOGY INC.									
	31650	08/25/2023	Net 60	Invoice	1,463.35	1,463.35	0.00	0.00	0.00
Total outstanding:					1,463.35	1,463.35	0.00	0.00	0.00
OPTIMUM QUALITY TOOLING INC.									
	31416	07/18/2023	Net 60	Invoice	1,236.22	0.00	1,236.22	0.00	0.00
	31417	07/18/2023	Net 60	Invoice	1,884.28	0.00	1,884.28	0.00	0.00
	31418	07/18/2023	Net 60	Invoice	2,493.91	0.00	2,493.91	0.00	0.00
	31509	08/01/2023	Net 60	Invoice	1,939.36	0.00	1,939.36	0.00	0.00
	31570	08/11/2023	Net 60	Invoice	4,577.63	4,577.63	0.00	0.00	0.00
	31639	08/24/2023	Net 60	Invoice	2,853.25	2,853.25	0.00	0.00	0.00
	31640	08/24/2023	Net 60	Invoice	2,462.27	2,462.27	0.00	0.00	0.00
	31666	08/29/2023	Net 60	Invoice	1,085.93	1,085.93	0.00	0.00	0.00
Total outstanding:					18,532.85	10,979.08	7,553.77	0.00	0.00
PLATINUM TOOL TECH.									
	31348	07/05/2023	Net 60	Invoice	2,107.45	0.00	0.00	2,107.45	0.00
	31373	07/11/2023	Net 60	Invoice	1,483.69	0.00	1,483.69	0.00	0.00
	31385	07/12/2023	Net 60	Invoice	9,185.77	0.00	9,185.77	0.00	0.00
	31419	07/18/2023	Net 60	Invoice	6,617.28	0.00	6,617.28	0.00	0.00
	31420	07/18/2023	Net 60	Invoice	781.40	0.00	781.40	0.00	0.00
	31440	07/21/2023	Net 60	Invoice	10,063.22	0.00	10,063.22	0.00	0.00
	31483	07/27/2023	Net 60	Invoice	3,090.55	0.00	3,090.55	0.00	0.00
	31519	08/02/2023	Net 60	Invoice	1,214.75	0.00	1,214.75	0.00	0.00
	31520	08/02/2023	Net 60	Invoice	1,091.58	0.00	1,091.58	0.00	0.00
	31526	08/03/2023	Net 60	Invoice	1,943.60	0.00	1,943.60	0.00	0.00
	31607	08/18/2023	Net 60	Invoice	535.62	535.62	0.00	0.00	0.00
	31651	08/25/2023	Net 60	Invoice	10,520.87	10,520.87	0.00	0.00	0.00
Total outstanding:					48,635.78	11,056.49	35,471.84	2,107.45	0.00
REACT TOOL & MOLD, INC.									
	31587	08/16/2023	Net 60	Invoice	1,635.11	1,635.11	0.00	0.00	0.00
	31588	08/16/2023	Net 60	Invoice	3,208.07	3,208.07	0.00	0.00	0.00
	31597	08/17/2023	Net 60	Invoice	855.41	855.41	0.00	0.00	0.00
	31598	08/17/2023	Net 60	Invoice	962.76	962.76	0.00	0.00	0.00
	31620	08/22/2023	Net 60	Invoice	2,730.65	2,730.65	0.00	0.00	0.00
	31621	08/22/2023	Net 60	Invoice	1,267.86	1,267.86	0.00	0.00	0.00
	31622	08/22/2023	Net 60	Invoice	1,184.24	1,184.24	0.00	0.00	0.00
	316700	09/05/2023	Net 60	Invoice	915.30	915.30	0.00	0.00	0.00
Total outstanding:					12,759.40	12,759.40	0.00	0.00	0.00
REDOE MOLD CO									
	31559	08/10/2023	Net 60	Invoice	697.78	697.78	0.00	0.00	0.00
	31589	08/16/2023	Net 60	Invoice	1,554.88	1,554.88	0.00	0.00	0.00
	31608	08/18/2023	Net 60	Invoice	1,238.48	1,238.48	0.00	0.00	0.00
Total outstanding:					3,491.14	3,491.14	0.00	0.00	0.00
SUPERIOR TOOL & MOLD									
	31368	07/10/2023	Net 60	Invoice	1,972.98	0.00	1,972.98	0.00	0.00
	31387	07/12/2023	Net 60	Invoice	362.73	0.00	362.73	0.00	0.00
	31388	07/12/2023	Net 60	Invoice	3,933.53	0.00	3,933.53	0.00	0.00
	31399	07/13/2023	Net 60	Invoice	1,956.03	0.00	1,956.03	0.00	0.00
	31400	07/13/2023	Net 60	Invoice	1,558.27	0.00	1,558.27	0.00	0.00
	31406	07/14/2023	Net 60	Invoice	1,824.95	0.00	1,824.95	0.00	0.00
	31407	07/14/2023	Net 60	Invoice	1,925.52	0.00	1,925.52	0.00	0.00
	31435	07/20/2023	Net 60	Invoice	856.54	0.00	856.54	0.00	0.00
	31450	07/24/2023	Net 60	Invoice	5,525.70	0.00	5,525.70	0.00	0.00
	31451	07/24/2023	Net 60	Invoice	1,923.83	0.00	1,923.83	0.00	0.00
	31458	07/25/2023	Net 60	Invoice	1,367.30	0.00	1,367.30	0.00	0.00
	31459	07/25/2023	Net 60	Invoice	977.45	0.00	977.45	0.00	0.00
	31469	07/26/2023	Net 60	Invoice	1,750.37	0.00	1,750.37	0.00	0.00
	31470	07/26/2023	Net 60	Invoice	968.41	0.00	968.41	0.00	0.00
	31484	07/27/2023	Net 60	Invoice	881.40	0.00	881.40	0.00	0.00
	31485	07/27/2023	Net 60	Invoice	1,426.06	0.00	1,426.06	0.00	0.00
	31504	07/31/2023	Net 60	Invoice	1,546.97	0.00	1,546.97	0.00	0.00
	31512	08/01/2023	Net 60	Invoice	1,181.98	0.00	1,181.98	0.00	0.00
	31513	08/01/2023	Net 60	Invoice	1,091.58	0.00	1,091.58	0.00	0.00
	31514	08/01/2023	Net 60	Invoice	1,604.60	0.00	1,604.60	0.00	0.00

31524	08/02/2023	Net 60	Invoice	1,605.73	0.00	1,605.73	0.00	0.00
31529	08/03/2023	Net 60	Invoice	2,987.72	0.00	2,987.72	0.00	0.00
31530	08/03/2023	Net 60	Invoice	1,311.93	0.00	1,311.93	0.00	0.00
31538	08/04/2023	Net 60	Invoice	1,709.13	0.00	1,709.13	0.00	0.00
31544	08/08/2023	Net 60	Invoice	1,667.88	0.00	1,667.88	0.00	0.00
31545	08/08/2023	Net 60	Invoice	1,333.40	0.00	1,333.40	0.00	0.00
31552	08/09/2023	Net 60	Invoice	3,135.75	3,135.75	0.00	0.00	0.00
31560	08/10/2023	Net 60	Invoice	2,811.44	2,811.44	0.00	0.00	0.00
31561	08/10/2023	Net 60	Invoice	2,514.82	2,514.82	0.00	0.00	0.00
31562	08/10/2023	Net 60	Invoice	1,926.09	1,926.09	0.00	0.00	0.00
31571	08/11/2023	Net 60	Invoice	684.78	684.78	0.00	0.00	0.00
31590	08/16/2023	Net 60	Invoice	3,919.97	3,919.97	0.00	0.00	0.00
31591	08/16/2023	Net 60	Invoice	1,722.12	1,722.12	0.00	0.00	0.00
31601	08/17/2023	Net 60	Invoice	2,869.07	2,869.07	0.00	0.00	0.00
31611	08/18/2023	Net 60	Invoice	923.21	923.21	0.00	0.00	0.00
31618	08/21/2023	Net 60	Invoice	2,250.96	2,250.96	0.00	0.00	0.00
31633	08/23/2023	Net 60	Invoice	1,654.89	1,654.89	0.00	0.00	0.00
31634	08/23/2023	Net 60	Invoice	1,547.54	1,547.54	0.00	0.00	0.00
31635	08/23/2023	Net 60	Invoice	1,994.45	1,994.45	0.00	0.00	0.00
31643	08/24/2023	Net 60	Invoice	2,745.90	2,745.90	0.00	0.00	0.00
31657	08/28/2023	Net 60	Invoice	1,377.47	1,377.47	0.00	0.00	0.00
31669	08/29/2023	Net 60	Invoice	1,119.83	1,119.83	0.00	0.00	0.00
31693	09/01/2023	Net 60	Invoice	835.07	835.07	0.00	0.00	0.00

Total outstanding: 79,285.35 34,033.36 45,251.99 0.00 0.00

WINDSOR MOLD

31369	07/10/2023	Net 60	Invoice	5,835.89	0.00	5,835.89	0.00	0.00
31408	07/14/2023	Net 60	Invoice	1,168.42	0.00	1,168.42	0.00	0.00
31409	07/14/2023	Net 60	Invoice	1,824.95	0.00	1,824.95	0.00	0.00
31421	07/17/2023	Net 60	Invoice	2,921.05	0.00	2,921.05	0.00	0.00
31461	07/25/2023	Net 60	Invoice	1,474.65	0.00	1,474.65	0.00	0.00
31471	07/26/2023	Net 60	Invoice	1,231.70	0.00	1,231.70	0.00	0.00
31505	07/31/2023	Net 60	Invoice	1,632.29	0.00	1,632.29	0.00	0.00
31531	08/03/2023	Net 60	Invoice	5,454.51	0.00	5,454.51	0.00	0.00
31553	08/09/2023	Net 60	Invoice	2,740.25	2,740.25	0.00	0.00	0.00
31584	08/15/2023	Net 60	Invoice	1,489.91	1,489.91	0.00	0.00	0.00
31612	08/18/2023	Net 60	Invoice	5,367.50	5,367.50	0.00	0.00	0.00
31625	08/22/2023	Net 60	Invoice	5,422.87	5,422.87	0.00	0.00	0.00
31644	08/24/2023	Net 60	Invoice	2,635.73	2,635.73	0.00	0.00	0.00
31658	08/28/2023	Net 60	Invoice	1,288.20	1,288.20	0.00	0.00	0.00
31694	09/01/2023	Net 60	Invoice	1,646.98	1,646.98	0.00	0.00	0.00
31695	09/01/2023	Net 60	Invoice	1,218.14	1,218.14	0.00	0.00	0.00

Total outstanding: 43,353.04 21,809.58 21,543.46 0.00 0.00

Total unpaid invoices:
Canadian Dollars 618,679.49 275,540.48 281,763.03 61,375.98 0.00
United States Dollars 0.00 0.00 0.00 0.00 0.00

Total deposits/prepaid orders:
Canadian Dollars 0.00 0.00 0.00 0.00 0.00
United States Dollars 0.00 0.00 0.00 0.00 0.00

Total outstanding in:
Canadian Dollars 618,679.49 275,540.48 281,763.03 61,375.98 0.00
United States Dollars 0.00 0.00 0.00 0.00 0.00

Generated On: 09/08/2023
Updated to: 09/14/2023

Total 618,679.49

Total Collections up to September 14, 2023

Net AR for sale 618,679.49
Less 10% holdback (61,867.95)
Balance to pay **556,811.54**

SCHEDULE B
PURCHASED INVENTORY

See attached.

Schedule B

**Injection technologies
Inventory**

5-Sep-23

	Proposed settlement		Actual costed	
	CAD	USD	CAD	USD
Boxes	\$ 23,126.60	-	\$ 23,126.60	-
Resin	1,473.09	\$ 101,591.02	\$ 7,986.72	\$ 156,387.06
Components	-	850.00	-	\$ 850.00
Parts (service not shipped)	-	-	12,333.27	-
	<u>\$ 24,599.69</u>	<u>\$ 102,441.02</u>	<u>\$ 43,446.59</u>	<u>\$ 157,237.06</u>

Invoiced under Deloitte for Aarkel

	Invoice #	Quantity	
890B	904281	1260	\$ 14,140.48
Tow hook assembly	904282	81	1,406.06
U553 Platinum Grille Carrier	904283	51	817.70
890B Roof Molding	904283	280	3,142.32
U553 Platinum Grille Carrier	904284	187	2,998.23
C121 Grill & tow cover assembly	904285	518	5,966.12
U553 Platinum Grille Carrier	904286	408	6,541.59
			<u>\$ 35,012.50</u>

Net due to Deloitte	\$ (10,412.81)	\$ 102,441.02
----------------------------	-----------------------	----------------------

in USD (1.3411) \$ (7,764.38) \$ 102,441.02

Net due in USD \$ 94,676.64

Net due in CAD (1.3411) **\$ 126,970.84**



0.748638583

ITEM	Production Material	Job #'s associated with material	Supplier	Inventry Totals LBS	Cost USD	Cost CAD	Total USD	Total CAD	Aarkel to pay CAD	Aarkel to pay USD	Aarkel to pay USD	Notes
5	Lustran ABS PG298 Q258 (BK 901802) Black	961, 962, 905, 964, 967	Avient (PolyOne)	5,400.00	1.57		\$ 8,451.00			\$ 8,451.00	\$ 8,451.00	21-Aug-23
6	Lotte Starex MPD160 R (BLACK) K2007 BK	Mazda Clips	The Materials Group	5,200.00	2.42		\$ 12,584.00			12,584.00	12,584.00	16-Aug-23
7	Styrenic TPE-60IN50 UV BLK	890B gasket, 983	Audia Elastomers	9,000.00	1.87		\$ 16,830.00			16,830.00	16,830.00	21-Aug-23
8	Lotte Triton YK-70358BCK PC/ASA resin (10y016 spec)	890B Roof Rail: 971, 974	The Materials Group	3,064.00	3.30		\$ 10,111.20			10,111.20	10,111.20	21-Aug-23
9	ASA Luran S, 777KJUV BK81099	US50 Program (some molds to 6/6/23)	Avient (PolyOne)	5,100.00	1.45		\$ 7,395.00			7,395.00	7,395.00	21-Aug-23
11	PC ABS XCV620 100 NAT (Cycloxy)	948-956 Polytch Program	Nexeo	3,080.00	3.31		\$ 10,197.57			10,197.57	10,197.57	23-Jul-23
13	Noryl	954, 953 (Outer)		50.00	9.25		\$ 462.50			462.50	462.50	
15	WR7000	890B Roof Rail Trial Material		750.00	3.30		\$ 2,475.00			2,475.00	-	LD - this was for a one time sample do not need
16	Laydon Pemaprene	Mudflap		11,100.00	-		\$ -			-	-	Sold by Receiver to ZF
17	LUCID Ultramid	Substrates		-	-		\$ -			-	-	
18	Laydon RTP4999	Backup Resin Mudflap		297.00	1.55		\$ -			-	-	Sold by Receiver to ZF
19	Lucid ULT8350UV	End Cap Lucid #9963		-	-		\$ -			-	-	
20	ST801_Zyrel			922.00	5.55		\$ 5,120.79			5,120.79	-	IT updated price have not confirmed awarded of Jul-23 tooling.
21	HYTREL 5556	301 Natural		1,356.00	4.56		\$ 6,187.43			6,187.43	6,187.43	25-Aug-23
22	Bayblend T50	Windsor Modules 307, 308	Avient (PolyOne)	-	-		\$ -			-	-	
23	Dynaflex	Ergo group - sample product		1,530.00	-		\$ -			-	-	Aug-21 Customer provided material
24	Luphal F20-03 Natural	Lexus Hook Program-Mayco		1,100.00	2.28		\$ 2,508.00			2,508.00	2,508.00	
	Notes - purchased and not received						\$ -			-	-	
	PAG K-FH50 BK25010 Akulon Box 200	Delivery ETA September 28, 2023		1,500.00	4.61		\$ 6,910.27			6,910.27	6,910.27	Sep-23
	KB Components	TPV Sarlink 171758		2,000.00	-	3.26	\$ -	6,513.64		-	-	30-Jul-23 Need to contact KB Components
	KB Components	Hifax TPO 1087		700.00	-	2.10	\$ -	1,473.09	1,473.09	-	-	8/18/2023; August 31, 2023
												Parts sold 1320 Tailgate 7-Sep
												1320 2.4 3168
1	Lustran ABS PG298 Q258 (BK 901802) Black	961, 962, 905, 964, 967	Avient (PolyOne)	5,400.00	1.57		\$ -			-	-	Aug-23 Duplicate above
2	PM66 A3WGE NAT ULTRAMID BAG 107 - 40255	RU Drum (Windsor Modules)	Nexeo	-	-		\$ -			-	-	
3	PC 141R 701 BK L5AN BAC107 - 699920	709, 702	Nexeo	-	-		\$ -			-	-	
4	A5199UV-01US COLOR S1 B8X 598 (598 Anthracite)	Gamma	Mytch Polymers	3,600.00	1.01		\$ -	0		-	-	Jul-05
5	TPO 3075 LVP 848 Black	Boellor, 963, 966	Washington Perm	2,170.00	1.49		\$ 3,233.30			3,233.30	3,233.30	Jul-23
6	LBI HIFAX (TYC 735 X Black)	900, 901, 902, 903 (K20K)	Avient (PolyOne)	50.00	2.86		\$ 143.00			-	-	Jul-23
7	Ineos LuranS 777KJUV 61066 (GM848A)	909, 910, 916 (GMT172 / L387 Inner)	Avient (PolyOne)	2,900.00	1.96		\$ 5,684.00			5,684.00	5,684.00	Oct-22 75%
8	LBI HIFAX (TYC 735P 207D) Charcoal	912, 913 (GMX211)	Avient (PolyOne)	10,700.00	2.37		\$ 25,359.00			25,359.00	-	based on orders end of year we do not need if Jul-22 needed we will purchase.
9	Ineos PG298 Grey 703693	914 (GMX211 DeckLid)	Avient (PolyOne)	3,500.00	1.89		\$ 6,615.00			6,615.00	1,663.75	Nov-22 we only need 25% of this material
10	Sequel 1480 - UV - RFX Black	915 (FCA Challenger)	Avient (PolyOne)	1,100.00	3.30		\$ 3,630.00			-	-	Oct-22
11	FH-120MSR NH633M	917, 918, 919, 920, 922 (Honda Service)	Advanced Composites	1,900.00	2.00		\$ 3,800.00			-	-	Jun-22
12	FH-120MSR NH664M	917, 918, 919, 920, 922 (Honda Service)	Advanced Composites	2,800.00	2.00		\$ 5,600.00			-	-	Jun-22
13	M464CSR NH633	921 (Honda Service)	Advanced Composites	425.00	2.00		\$ 850.00			-	-	Jun-22
14	T20-P100 Rheolux	700	Avient (PolyOne)	-	-		\$ -			-	-	
15	Delrin 100P Black	701	Avient (PolyOne)	-	-		\$ -			-	-	
16	DR51 Valox	702	Nexeo	-	-		\$ -			-	-	
17	Delrin 500P Black	703	Avient (PolyOne)	-	-		\$ -			-	-	
18	Lustran HHT827	704	Avient (PolyOne)	-	-		\$ -			-	-	
19	Lexan 141R 703 Med Grey	705	?	-	-		\$ -			-	-	
20	555SHS Hytel	706	Avient (PolyOne)	550.00	-		\$ -			-	-	Apr-21
21	Bayblend T85	707	Avient (PolyOne)	-	-		\$ -			-	-	
22	Makrolon 2605-901510	708	Avient (PolyOne)	-	-		\$ -			-	-	
23	PC ABS XCV620 100 NAT (Cycloxy)	948-956 Polytch Program	Nexeo	3,080.00	3.00		\$ 9,240.00			9,240.00	9,240.00	Jul-23
20	9P855RSRU	921 (Honda Service) replacement material	Advanced Composites	1,500.00	2.00		\$ 3,000.00			-	-	May-22
Added	Cycloxy BK 10005	H2 Q Roof Rack		665.00	-		\$ -			-	-	Jan-21
	P/KWJ08A - Hematite			3,300.00	-		\$ -			-	-	Jun-21 Owned by customer
	Dynalloy BLK			200.00	-		\$ -			-	-	Jun-21 Sample for Ergo
	IT Puls 11900-1203 Integrity B13 Blk	Provided by integrity		11,088.00	-		\$ -			-	-	Mar-23
Total Resin - USD							\$156,387.06	\$ 7,986.72	\$ 1,473.09	\$139,507.06	\$ 101,591.02	

Parts	Part number	Quantity	Price	Total USD
9571		300.00	1.4361	430.83
9572		300.00	1.4361	430.83
9573	DZLC	1,400.00	1.9983	2,797.62
9574	DZLC	1,400.00	1.9983	2,797.62
#301 Ultra	71345-480200	invoiced September 11		
#301	71345-X1M090	invoiced September 11		
9315	Grill	378.00	11.89	4,492.57
9316	Inner Grill	96.00	14.4146	1,383.80
4281	Skyjack	52.00		
12,333.27				

Components	Part number	Quantity	Cost USD	Cost CAD	Total USD
Plant 2	Mayco Hooks ropes	5,000.00	0.17		\$ 850.00
\$ 850.00 \$ 850.00					

SCHEDULE C

EQUIPMENT RE: EQUIPMENT CREDIT

See attached.

Wire Activity - Summary Report

Brian Dales , AARKEL TOOL & DIE
Report Creation Date: Sep 21, 2023 12:05:33 PM ET

Value Date Range: From To

Debit Account(s): 1 **selected**

Status: **All**

Amount Range: **All**

Payment Currency: **All**

Payment Currency: CAD

Template Name: Corporate Asset

Template Description: Coporate Assets

Value Date: Sep 20, 2023 **Payment Amount:** 60,003.00 CAD

Debit Account: 00003-07582-1003474-CAD-AARKEL TOOL AND DIE

Credit Information: 00016-10002-724235001-CAD-CORPORATE ASSETS INC.

Beneficiary: CORPORATE ASSETS INC.

Status: Completed

Approved by: Taryn Burgess, Brian Dales

Created by: Joanne Snow, Sep 20, 2023 at 12:16 PM ET

Last Modified by:

Released by: Brian Dales, Sep 20, 2023 at 04:04 PM ET

Total payment amount: 60,003.00

Number of wire payments: 1

***** End of report *****

SCHEDULE D

LETTER OF DIRECTION AND AUTHORIZATION

FROM: Deloitte Restructuring Inc. (the “**Receiver**”), solely in its capacity as Court-appointed receiver of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc.

TO: AarKel Testing Technologies Inc. (“**AarKel**”)

AND TO: All account debtors identified in Exhibit A attached hereto (the “**Customers**”)

RE: Payment of the Purchased Receivables pursuant to that certain receivables and inventory purchase agreement dated September 22, 2023 between AarKel and the Receiver (the “**Agreement**”)

WHEREAS AarKel agreed to purchase from the Receiver, and the Receiver agreed to sell to AarKel, the Purchase Receivables (as defined in the Agreement).

AND WHEREAS it is a condition to the closing of the Agreement that the Receiver deliver this Letter of Direction and Authorization to AarKel with respect to the Purchased Receivables;

Upon and at any time following the date hereof, the Receiver hereby authorizes and directs the Customers to pay directly to, or as directed by, AarKel all Purchased Receivables accruing or now due and owing without deduction or set off. The Receiver hereby authorizes the Customers to rely upon and comply with any notice or demand from AarKel for payment of amounts owing to AarKel from the Purchased Receivables.

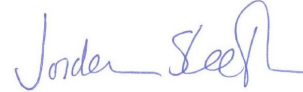
The Customers may conclusively rely on this Letter of Direction and Authorization and shall have no duty to make any inquiry or investigation with respect to the correctness of this Letter of Direction and Authorization.

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DATED AS OF THIS 22nd day of September, 2023.

**DELOITTE RESTRUCTURING INC., solely
in its capacity as Court-appointed receiver of
INJECTION TECHNOLOGIES INC.,
MOLDCO PLASTICS INC., and MOLDCO
HOLDINGS INC., and not in its personal or
corporate capacity**

Per:



Name: Jorden Sleeth, CPA, CA, CIRP, LIT

Title: Senior Vice-President

APPENDIX "I"

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO
HOLDINGS INC.

Respondents

RECEIVER'S CERTIFICATE

RECITALS

A. Pursuant to an Order of the Honourable Justice Steele of the Ontario Superior Court of Justice (the "Court") dated May 26, 2023, Deloitte Restructuring Inc. was appointed as the receiver (the "Receiver") of the undertaking, property and assets of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the "Debtors").

B. Pursuant to an Order of the Court dated August 25, 2023, the Court approved the agreement of purchase and sale made as of August 4, 2023 (the "Sale Agreement") between the Receiver and Corporate Assets Inc. (the "Purchaser") and provided for the vesting in the Purchaser of the Debtor's right, title and interest in and to the Purchased Assets, which vesting is to be effective with respect to the Purchased Assets upon the delivery by the Receiver to the Purchaser of a certificate confirming (i) the payment by the Purchaser of the Purchase Price for the Purchased Assets; (ii) that the conditions to Closing as set out in the Sale Agreement have been satisfied or waived by the Receiver and the Purchaser; and (iii) the Transaction has been completed to the satisfaction of the Receiver.

APPENDIX "J"

In the matter of the Receivership of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc.

Statement of Receipts and Disbursements

For the period May 26, 2023 to November 30, 2023

presented in thousands of dollars (000's)

CAD/USD - 11.30.23
1.3582

	<i>Notes</i>	Combined			
		CAD \$ Account	USD \$ Account	Projected (CAD) Note 1	Total Expected Recovery (CAD) (Actual + Projected)
Receipts					
Sale of Assets		7,153	-	-	7,153
<i>Sale of Kitchener</i>	<i>Note 2</i>	2,000	-	-	2,000
<i>Sale of Windsor</i>	<i>Note 3</i>	5,100	-	-	5,100
<i>Sale of Assets - Other</i>	<i>Note 4</i>	53	-	-	53
Collection of opening accounts receivable		2,592	709	-	3,555
<i>Continuing customers</i>	<i>Note 5</i>	2,307	414	-	2,870
<i>Discontinued customers</i>	<i>Note 5</i>	285	294	-	685
Collection from new sales		5,023	1,298	205	6,991
<i>Production</i>	<i>Note 6</i>	3,165	798	197	4,445
<i>Finished Goods</i>		313	405	-	863
<i>Raw material</i>		235	73	7	341
<i>Tryouts</i>	<i>Note 7</i>	1,311	22	2	1,343
HST collected	<i>Note 8</i>	857	38	27	935
Transfers between Receivership trust accounts		(0)	(0)	-	(0)
<i>Intercompany receipts</i>		3,197	1,271	-	4,923
<i>Intercompany transfers</i>		(3,197)	(1,271)	-	(4,923)
Interest & other cash receipts		95	6	6	109
Government program receipts		18	-	-	18
Total Receipts		15,739	2,051	237	18,761

In the matter of the Receivership of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc.

Statement of Receipts and Disbursements

For the period May 26, 2023 to November 30, 2023

presented in thousands of dollars (000's)

CAD/USD - 11.30.23
1.3582

	<i>Notes</i>	Combined			
		CAD \$ Account	USD \$ Account	Projected (CAD)	Total Expected Recovery (CAD)
				Note 1	(Actual + Projected)
Disbursements					
Payroll and related benefits	<i>Note 9</i>	(2,017)	-	(9)	(2,026)
<i>Gross payroll</i>		(1,344)	-	(4)	(1,348)
<i>Benefits (medical, dental, etc.)</i>		(88)	-	-	(88)
<i>Receiver's portion - CPP</i>		(120)	-	-	(120)
<i>Receiver's portion - EI</i>		(44)	-	-	(44)
<i>Receiver's portion - EHT</i>		(34)	-	-	(34)
<i>Source deductions</i>		(374)	-	-	(374)
<i>WSIB</i>		1	-	-	1
<i>Others - processing fee</i>		(14)	-	(5)	(19)
Cost of Goods Sold	<i>Note 10</i>	(344)	(959)	(40)	(1,687)
<i>Resin</i>		(130)	(924)	-	(1,386)
<i>Direct Materials</i>		(62)	(16)	-	(83)
<i>Duty & Brokerage</i>		(17)	-	-	(17)
<i>Shop supplies</i>		(35)	(1)	(10)	(46)
<i>Packaging</i>		(29)	-	-	(29)
<i>Freight</i>		(15)	(18)	-	(40)
<i>Others - COGS</i>		(2)	-	-	(2)
<i>Tooling expenses</i>		(55)	-	(30)	(85)
Overhead costs (e.g. insurance, cleaning)	<i>Note 11</i>	(312)	(28)	(12)	(361)
<i>Insurance</i>		(127)	(26)	(7)	(169)
<i>Repairs & Maintenance</i>		(20)	(1)	-	(22)
<i>Security</i>		(129)	-	-	(129)
<i>Operating leases</i>		(36)	-	(5)	(41)
Rent	<i>Note 12</i>	(706)	-	(79)	(785)
<i>Windsor Plant</i>		(211)	-	-	(211)
<i>Windsor Warehouse</i>		(30)	-	-	(30)
<i>Kitchener Plant</i>		(465)	-	(79)	(544)
<i>Kitchener Warehouse</i>		-	-	-	-
Utilities	<i>Note 12</i>	(245)	-	(18)	(263)
<i>Hydro</i>		(239)	-	(18)	(257)
<i>Water</i>		(5)	-	-	(5)
<i>Natural Gas</i>		(1)	-	-	(1)
Other Manufacturing Costs		(84)	(1)	(3)	(88)
<i>Computer network expenses</i>		(37)	-	(2)	(39)
<i>Bank & wire charges</i>		(3)	(1)	-	(4)
<i>Telephone</i>		(11)	-	(1)	(12)
<i>Others</i>		(33)	-	-	(33)

In the matter of the Receivership of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc.

Statement of Receipts and Disbursements

For the period May 26, 2023 to November 30, 2023

presented in thousands of dollars (000's)

CAD/USD - 11.30.23
1.3582

	<i>Notes</i>	Combined			
		CAD \$ Account	USD \$ Account	Projected (CAD) Note 1	Total Expected Recovery (CAD) (Actual + Projected)
Other Operating Costs		(39)	0	-	(39)
<i>Office cleaning</i>		(9)	-	-	(9)
<i>Sale process advertising</i>		(3)	-	-	(3)
<i>Travel</i>		(0)	-	-	(0)
<i>Interest</i>		(3)	-	-	(3)
<i>OSB filing fees</i>		(0)	-	-	(0)
<i>Others</i>		(23)	0	-	(23)
HST Paid (ITC's and Remittances)	<i>Note 8</i>	(512)	(80)	-	(621)
<i>HST Paid (ITC)</i>		(431)	(80)	-	(539)
<i>HST Paid (Remittance)</i>		(81)	-	-	(81)
Professional Fees		(1,985)	-	-	(1,985)
<i>Advance to Trustee</i>	<i>Note 13</i>	(100)	-	-	(100)
<i>Legal & Professional fees</i>		(186)	-	-	(186)
<i>Receivership fees</i>		(1,699)	-	-	(1,699)
Total Disbursements		(6,244)	(1,068)	(160)	(7,854)
Net Receipts before priority claims and remaining professional fees		\$ 9,495	\$ 983	\$ 77	\$ 10,907

Estimated Interim Distribution

Based on actual R&D to November 30, 2023, plus various accruals to finalize the Receivership

		High	Low
Net Receipts		\$ 10,907	\$ 10,907
Priority Claims			
<i>Employee source deductions trust amounts</i>	<i>Note 14</i>	(489)	(1,348)
<i>BMO Unit Recovery</i>	<i>Note 15</i>	(976)	(976)
<i>HST Payable throughout Receivership Period</i>	<i>Note 16</i>	(300)	(300)
<i>BIA section 81.3/81.4 employee claims</i>	<i>Note 17</i>	(69)	(69)
<i>Gary Paul Cluthe Family Trust</i>	<i>Note 18</i>	-	(200)
<i>Sales tax, HST, GST Arrears prior to May 26, 2023</i>	<i>Note 19</i>	-	-
Net available after priority claims		\$ 9,073	\$ 8,014
<i>Contingency</i>	<i>Note 20</i>	(250)	(250)
Professional fees			
<i>Legal & Professional fees</i>	<i>Note 21</i>	(50)	(75)
<i>Receivership fees</i>	<i>Note 22</i>	(200)	(250)
Net available for interim distribution		\$ 8,573	\$ 7,439

TD Indebtedness

\$ 15,579

In the matter of the Receivership of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc.
Statement of Receipts and Disbursements
For the period May 26, 2023 to November 30, 2023
presented in thousands of dollars (000's)

CAD/USD - 11.30.23 1.3582

Notes

- 1 - The Estimated Realizations column represents the average collections expected between high and low scenarios where a single data point estimate cannot be made.
- 2 - Sale of Kitchener Assets reflects the guaranteed amount received from Corporate Assets. The auction of Kitchener assets did not exceed the profit sharing threshold.
- 3 - Sale of Windsor Assets reflects the amounts received for the sale of the Windsor Business to AarKel, not including the sale of AR or Inventory (Resin).
- 4 - Sale of Other Assets reflects the sale of Moldco owned Mold Bases to customers.
- 5 - The Receiver collected ~86% of the book value of the accounts receivable as at May 26, 2023.
- 6 - Production collections (i.e., for FG produced by the Receiver) consists primarily of collections from key customers at the Kitchener facility (Skyjack, Raymond, MASCO). The projected realization amounts relate primarily to final collections from Rollstamp totalling ~\$247,000 and includes a small adjustment to remit collections made on behalf of AarKel.
- 7 - Try-Out collections relates to revenue generated by the Receiver and includes a reconciliation with AarKel whereby 90% of accounts were purchased by AarKel with used as a cushion for late deposit adjustments. The current expectation is that minimal cash will end up being exchanged in this process.
- 8 - HST Collections relate to HST collected on new sales (i.e., post May 26, 2023). The estimated HST collections relate to HST that will be collected on remaining receivables. HST collected, net of HST paid (i.e., input tax credits for HST paid on goods and services purchased by the Receiver), must be remitted to the CRA (refer to Note 21).
- 9 - The Receiver will incur minimal payroll costs to employ a subcontractor throughout the auction period until the Kitchener premises are returned the landlord.
- 10 - Projected Cost of Goods Sold is driven by repairs required on customer tools.
- 11 - Projected overhead costs include building insurance and equipment leases.
- 12 - Rent and Utilities are to be incurred up to December, in Kitchener only, to facilitate the auction and return it to the landlord in broom-swept condition.
- 13 - The Receiver has transferred funds to finance the bankruptcies of ITI and MPI.
- 14 - Relates to pre-receivership obligations and does not factor in any potential allocation to BMO. CRA has advised that amounts paid by the Companies were applies to the incorrect accounts. Accordingly, the net source deduction obligation has been assumed at approximately \$489,000.
- 15 - Amount due to BMO in respect of its security is as agreed with BMO (\$976,000).
- 16 - HST payable throughout the receivership period (i.e., HST collected vs. ITCs paid). HST filings have been made from May 26, 2023 to October 31, 2023. Remittances have been made up to July 31, 2023. Amount due is currently \$289,000 which has been rounded to \$300,000. Note that the sale of Kitchener Assets was an HST bearing transaction.
- 17 - Represents the super priority portion payable to Service Canada with respect to WEPPA.
- 18 - The Receiver has included the total, should this claim be in priority to TD's security.
- 19 - The Receiver has bankrupted the companies and as such this is no longer a priority claim. It has been included here for completeness.
- 20 - The Receiver has a \$250,000 contingency to cover any unforeseen costs.
- 21 - Estimated legal fees to complete the Receiver's second report and seek the Receiver's discharge.
- 22 - Estimate for Receivers fees to complete the administration of the Receivership (excl. HST). October 1 - Novemeber 30 fees are ~\$135,000. Accruals provide for \$65,000 to \$115,000 to complete the administration, which primarily consists of returning the Kitchener premises to the landlord, resolving the CRA payroll deemed trust claim and overpayment, filing Receiver certificates, Receiver reports pursuant to the BIA and issuing a final distribution.

APPENDIX "K"

Harrison Pensa

LAWYERS

Timothy C. Hogan

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anewman@harrisonpensa.com

December 11, 2023

Via E-Mail – sdamiani@deloitte.ca

Deloitte Restructuring Inc.
8 Adelaide Street West, Suite 200
Toronto, ON, M5H 0A9

Attention: Stefano Damiani

Dear Sir:

**Re: Injection Technologies Inc. (“ITI”), Moldco Plastics Inc. (“Plastics”) and Moldco Holdings Inc. (“Holdings”) (collectively, the “Debtors”)
Our File No. 196904**

This will confirm your instructions for us to review and provide an opinion to Deloitte Restructuring Inc., in its capacity as Court appointed Receiver of the Debtors, regarding the security provided by the Debtors to The Toronto-Dominion Bank (the “**Bank**”).

In preparing this opinion, we have reviewed the following documentation:

1. An Ontario *Personal Property Security Act* (“**PPSA**”) search as against each of the Debtors current to December 10, 2023;
2. A corporate profile of each of the Debtors;
3. Affidavit of Mathieu Lafortune, sworn May 15, 2023 in Ontario Superior Court of Justice (Commercial List) (the “**Court**”) File No. CV-23-00699663-00CL, and all exhibits to same (the “**Application**”);
4. Master Lease Agreement No. T000002389 as between ITI and the Bank (as TD Equipment Finance Canada, a division of The Toronto-Dominion Bank) dated July 25, 2018 (the “**Master Lease Agreement**”), and the following leases governed thereunder:
 - a. Lease Schedule No. 18008630 dated July 25, 2018 (60 month term beginning August 2, 2018) for the lease of a certain Krauss Maffei Injection Molding Machine (s/n 61030497), as amended by Lease Amendment dated July 25, 2018, and ancillary documents including Delivery and Acceptance Certificate dated July 25, 2018 confirming receipt and acceptance of the equipment by ITI;
 - b. Lease Schedule No. 19002070 dated March 1, 2019 (60 month term beginning March 15, 2019) for the lease of a certain Injection Krauss Maffei Injection

Harrison Pensa LLP

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harrisonpensa.com

Molding Machine (s/n 61031329), as amended by Lease Amendment dated March 1, 2019, and ancillary documents including Delivery and Acceptance Certificate dated March 1, 2019 confirming receipt and acceptance of the equipment by ITI.

- c. Loan Agreement No. 19012410 dated October 28, 2019 (60 month term drawdown) for the lease of certain Injection Molding and related equipment (s/n 1206R008, 10100011316, 10100007034, 10100013047) (the “**19012410 Equipment**”)
 - i. Equipment Delivery Acknowledgement dated April 11, 2019 confirming receipt and acceptance of the equipment by ITI.
- d. Loan Agreement No. 20010470 dated July 28, 2020 (60 month term beginning on drawdown date) for the lease of a certain Ton Krauss Maffei Injection Molding Machine bearing serial number 65000127 (the “**Maffei Machine**”)
 - i. Equipment Delivery Acknowledgement dated “July 27, 28, 29” confirming receipt and acceptance of the equipment by ITI.
- e. Loan Agreement No. 20018130 dated December 17, 2020 (60 month term beginning on drawdown date) for the lease of the following equipment: 2020 Advantage cooling tower system (s/n 176852 – 176855 inclusive), 2015 Cincinatti Injection Molding Machine (s/n Z36LHGC010022), five (5) Yushin Take Out Robots (s/n 20007617-0090, 20009883-0020, 20009883-0030, 20007617-0160, 3900418002) (the “**20018130 Equipment**”)
 - i. Undated but executed Equipment Delivery Acknowledgement confirming receipt and acceptance of the equipment by ITI;
 - ii. Subordination and Postponement Agreement from Bank of Montreal dated December 21, 2020, in relation to the 20018130 Equipment; and,
 - iii. Waiver of Interest from Wells Fargo Equipment Finance Company dated January 11, 2021 in relation to the 20018130 Equipment.
- f. Lease Agreement No. 21014000 dated August 11, 2021 (60 month term beginning August 17, 2021) for the lease of certain Borche Injection Molding Machines described at Schedule “A” thereto (s/n 2202T168, 2206T129, 2205T084), as amended by Lease Amendment dated August 17, 2021, and ancillary documents including Delivery and Acceptance Certificate dated August 11, 2021 confirming receipt and acceptance of the equipment by ITI;
- g. Lease Agreement No. 21018450 dated October 21, 2021 (60 month term beginning October 25, 2021) for the lease of certain Borche Injection Molding Machines described at Schedule “A” thereto (s/n 2203S102, 1204R062) and related transformers, as amended by Lease Amendment dated October 25, 2021, and ancillary documents including Delivery and Acceptance Certificate dated October 21, 2021 confirming receipt and acceptance of the equipment by ITI.

(collectively, the “**Lease Documents**”)

- 5. Order of the Court in the Application dated May 26, 2023 (the “**Appointment Order**”);
- 6. General Security Agreement from ITI dated June, 2021 (the “**ITI GSA**”);

7. General Security Agreement from Plastics dated June, 2021 (the “**Plastics GSA**”);
8. General Security Agreement from Holdco dated June, 2021 (the “**Holdings GSA**”, collectively with the ITI GSA and the Plastics GSA, the “**GSAs**”);
9. Security Agreement for Specified Assets from ITI dated October 17, 2019 granting the Bank a security interest in the 19012410 Equipment (the “**October 2019 Security Agreement**”);
10. Security Agreement for Specified Assets from ITI dated July 28, 2020 granting the Bank a security interest in the Maffei Machine (the “**July 2020 Security Agreement**”); and,
11. Security Agreement for Specified Assets from ITI dated December 17, 2020 granting the Bank a security interest in the 20018130 Equipment (the “**December 2020 Security Agreement**”, collectively with the October 2019 Security Agreement and the July 2020 Security Agreement, the “**Specific Security Agreements**”).

A. Assumptions and Qualifications

The comments and opinions hereafter expressed are subject to the assumptions and qualifications detailed at Schedule “A” to this letter.

B. The Debtor

ITI is a British Columbia corporation formed on July 31, 2015 and with its registered office located in Vancouver, British Columbia.

Plastics is a British Columbia corporation formed on June 20, 2013 in Ontario, and continued into British Columbia on January 29, 2021, and with its registered office located in Vancouver, British Columbia. Prior to January 29, 2021, Plastics was known as “Moldco Inc.”.

Holdings is a British Columbia corporation formed on July 15, 2014 in Ontario, and continued into British Columbia on January 29, 2021, and with its registered office located in Vancouver, British Columbia.

C. The Personal Property Security

The ITI GSA

We have reviewed the ITI GSA. The ITI GSA is enforceable on its face, attachment having occurred pursuant to the provisions of the PPSA on the date of execution by ITI and the advance of funds by the Bank to ITI.

The ITI GSA grants a continuing security interest in all of ITI’s present and after acquired personal property and undertaking including, without limitation, Inventory, Equipment, Accounts and Debts, and Intellectual Property (all as defined therein), and all intangibles.

Lease Documents

We have reviewed the Master Lease Agreement and the remaining Lease Documents, which appear valid on their face.

The Specific Security Agreements

We have reviewed the Specific Security Agreements. Each of the Specific Security Agreements is enforceable on its face, attachment having occurred pursuant to the provisions of the PPSA on the date of execution by ITI and the advance of funds by the Bank to ITI in relation to the collateral identified in the relevant Specific Security Agreements.

The Specific Security Agreements grant the Bank a continuing security interest in the collateral identified at Schedule “A” to each agreement.

A certified PPSA search in Ontario current to December 10, 2023 as against ITI shows the following registrations:

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank	Injection Technologies Inc.	741980835 – 20180725 1429 1793 3307 (8 years)	Equipment, Other. Motor Vehicle	2018 KRAUSSMAFFEI KM551-4300GX (VIN: 61030497) ONE (1) NEW 2018 KRAUSSMAFFEI MODEL KM551-4300GX SERIAL NUMBER 61030497 INJECTION MOLDING MACHINE COMPLETE WITH ACCESSORIES AND ATTACHMENTS TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	20180802 1706 1462 4815 – To add collateral classification.
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of	Injection Technologies Inc.	748700703 – 20190301 0908 1793 0659 (8 years)	Equipment, Other	(1) 2018 KRAUSS MAFFEI KM300-1400 CX INJECTION MOLDING MACHINE S/N 61031329 TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
The Toronto-Dominion Bank				AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	
Bank Of Montreal/ Banque De Montreal	Injection Technologies Inc.	749875842 – 20190405 1936 1531 9942 (6 years)	Equipment, Other	ONE NEW 2018 KRAUSS MAFFEI INJECTION MOULDING MACHINE MODEL # KM1600-8100-2000-2000-3000MXHHL, SERIAL # 61030477 AND ALL PRESENT AND FUTURE ATTACHMENTS, ACCESSORIES, REPAIR AND REPLACEMENT PARTS AND OTHER PROPERTY AND FEATURES PLACED ON, ATTACHED TO OR INCORPORATED INTO THE EQUIPMENT, AND ALL PRESENT OR AFTER-ACQUIRED INSURANCE INDEMNITIES, REPLACEMENT VALUE, PAYMENTS AND PROCEEDS THAT ARE OR MAY BE RECEIVED IN REGARDS TO THE EQUIPMENT WHEREVER SITUATED	
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank	Injection Technologies Inc.	756617319 – 20191017 1514 1793 1792 (6 years)	Equipment, Other	(1) ONE NEW 2019 BS320T INJECTION MOLDING PRESS (S/N 1206R008) (1) ONE NEW 2019 SWING-ARM SPRUE PICKER (S/N 10100011316) (1) ONE NEW 2019 5 AXIS ROBOT MDW-110S-150-110-25TR 2AXIS MM-2500 (S/N 10100007034) (1) ONE NEW 2019 5 AXIS ROBOT MBW-130-150-130-P/N-30TR Z AXIS ADD 5MM (S/N 10100013047) TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR	20191025 1404 1462 1421 – To add a second debtor to the original Registration.

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
				PROCEEDS OF THE COLLATERAL.	
De Lage Landen Financial Services Canada Inc.	Injection Technologies Inc.	756664848 – 20191018 1445 1530 2408 (4 years)	Equipment, Accounts, Other	ALL PERSONAL PROPERTY OF THE DEBTOR FINANCED BY THE SECURED PARTY, WHEREVER SITUATED, CONSISTING OF LED LIGHTING RETROFIT, TOGETHER WITH ALL PARTS AND ACCESSORIES RELATING THERETO, ALL ATTACHMENTS, ACCESSORIES AND ACCESSIONS THERETO OR THEREON, ALL REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS OF ALL OR ANY PART OF THE FOREGOING AND ALL PROCEEDS IN ANY FORM DERIVED THEREFROM.	
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank	Injection Technologies Inc.	763969221 – 20200722 1620 1793 4819 (6 years)	Equipment, Other	(1) 2016 KM 850-8100 MX CN 955 TON KRAUSS MAFFEI INJECTION MOLDING MACHINE S/N 65000127 (1) 2015 CINCINNATI F360-12.59 360 TON INJECTION MOLDING MACHINE S/N Z36LHGC010022 (1) 2015 CINCINNATI F160-2.72 160 TON INJECTION MOLDING MACHINE S/N Z16LGCC010029 TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	20200723 1703 1462 0578 – Amend business debtor name to include Inc.
Meridian Onecap Credit Corp	Injection Technologies Inc.	764978526 – 20200821 1121 1902 2640 (6 years)	Equipment, Other	RAMP(S) TOGETHER WITH ALL ATTACHMENTS ACCESSORIES ACCESSIONS REPLACEMENTS SUBSTITUTIONS ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
				DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO AN INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL	
<p>The Toronto-Dominion Bank</p> <p>TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank</p>	<p>Injection Technologies Inc.</p>	<p>766455525 – 20201005 1545 1793 9017 (6 years)</p>	<p>Equipment, Other</p>	<p>2015 CINCINNATI MODEL F-360-12.59 360-TON INJECTION MOLDING MACHINE S/N Z36LHGC010022 TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.</p>	
<p>The Toronto-Dominion Bank</p> <p>TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank</p>	<p>Injection Technologies Inc.</p>	<p>768651363 – 20201217 1622 1793 3680 (6 years)</p>	<p>Equipment, Other</p>	<p>2020 ADVANTAGE ATS 210-2P 575 VOLT COOLING TOWER SYSTEM S/N 176852, 176853, 176854, 176855 2015 CINCINNATI F-360-12.59 INJECTION MOLDING MACHINE S/N Z36LHGC010022 2020 YUSHIN RCII-250S-17-9.5 TAKE OUT ROBOT WITH E-TOUCH II CONTROLLER S/N 20007617-0090 2020 YUSHIN RCII-250S-17-9.5 TAKE OUT ROBOT WITH E-TOUCH II CONTROLLER S/N 20009883-0020 2020 YUSHIN RCII-250S-17-9.5 TAKE OUT ROBOT WITH E-TOUCH II CONTROLLER S/N 20009883-0030 2020 YUSHIN RCII-400S-19-13 TAKE OUT ROBOT WITH E-TOUCH II CONTROLLER S/N 20007617-0160 2011 YUSHIN RCII-600S-25-15.5 TAKE OUT ROBOT WITH E-TOUCH II CONTROLLER S/N 3900418002 TOGETHER WITH ALL</p>	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
				ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	
Meridian Onecap Credit Corp.	Injection Technologies Inc.	772067709 – 20210430 1231 1902 4328 (6 years)	Equipment, Other	RAMP AND PLATFORM (S) TOGETHER WITH ALL ATTACHMENTS ACCESSORIES ACCESSIONS REPLACEMENTS SUBSTITUTIONS ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO AN INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL	
The Toronto-Dominion Bank	Injection Technologies Inc.	773169966 – 20210604 1418 1590 4007 (5 years)	Inventory, Equipment, Accounts, Other, Motor Vehicle		
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of The Toronto-	Injection Technologies Inc.	775407384 – 20210813 1550 1793 9687 (8 years)	Equipment, Other	2021 BORCHE BS120T (S/N 2202T168) INJECTION MOLDING MACHINE C/W ATTACHMENTS & ACCESSOIRES INCLUDING A TRANSFORMER. 2021 BORCHE BS320T (S/N 2206T129) INJECTION MOLDING MACHINE C/W ATTACHMENTS & ACCESSORIES INCLUDING A TRANSFORMER AND A EXTRA A SIZE SCREW AND BARREL. 2021 BORCHE BS260T (S/N 2205T084) INJECTION MOLDING MACHINE C/W ATTACHMENTS &	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
Dominion Bank				ACCESSORIES INCLUDING A TRANSFORMER. TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	
The Toronto-Dominion Bank TD Equipment Finance Canada, A Division Of The Toronto-Dominion Bank	Injection Technologies Inc.	777512223 – 20211021 1232 1793 4364 (8 years)	Equipment, Other	2021 BORCHE BS150T (S/N 2203S102) INJECTION MOLDING MACHINE W/ JVC TRANSFORMER (S/N 44KVA) C/WATTACHMENTS AND ACCESSORIES. 2021 BORCHE BS200T (S/N 1204R062) INJECTION MOLDING MACHINE W/ JVC TRANSFORMER (S/N 52KVA) C/WATTACHMENTS AND ACCESSORIES. TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS THERETO AND ALL PROCEEDS IN ANY FORM DERIVED DIRECTLY OR INDIRECTLY FROM ANY SALE AND OR DEALINGS WITH THE COLLATERAL AND A RIGHT TO ANY INSURANCE PAYMENT OR OTHER PAYMENT THAT INDEMNIFIES OR COMPENSATES FOR LOSS OR DAMAGE TO THE COLLATERAL OR PROCEEDS OF THE COLLATERAL.	
CWB National Leasing Inc.	Injection Technologies Inc.	778988655 – 20211213 1411 6005 6755 (4 years)	Equipment	ALL SECURITY SYSTEMS, FIXED WIDE ANGLE IP TURRET CAMERAS, VIDEO RECORDER OF EVERY NATURE OR KIND DESCRIBED IN AGREEMENT NUMBER 3080469, BETWEEN THE SECURED PARTY AND THE DEBTOR, AS AMENDED	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
				FROM TIME TO TIME, TOGETHER WITH ALL ATTACHMENTS, ACCESSORIES, SUBSTITUTIONS AND PROCEEDS OF ANY KIND DERIVED DIRECTLY OR INDIRECTLY THEREFROM.	
De Lage Landen Financial Services Canada Inc.	Injection Technologies Inc.	783710595 – 20220606 1933 1531 3426 (5 years)	Equipment, Accounts, Other, Motor Vehicle	2015 YALE ERP040VT (VIN: G807N07753N) 2018 UNICARRIERS FCG25L-A1 (VIN: CP1F29W27624) 2015 YALE ERP040VT (VIN: G807N07560N) ALL PERSONAL PROPERTY OF THE DEBTOR DESCRIBED HEREIN BY VEHICLE IDENTIFICATION NUMBER OR SERIAL NUMBER, AS APPLICABLE, WHEREVER SITUATED, TOGETHER WITH ALL PARTS AND ACCESSORIES RELATING THERETO, ALL ATTACHMENTS, ACCESSORIES AND ACCESSIONS THERETO OR THEREON, ALL REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS OF ALL OR ANY PART OF THE FOREGOING AND ALL PROCEEDS IN ANY FORM DERIVED THEREFROM.	
De Lage Landen Financial Services Canada Inc.	Injection Technologies Inc.	785020977 – 20220719 1048 1529 3495 (5 years)	Equipment, Accounts, Other, Motor Vehicle	2018 UNICARRIERS / FCG25L-A1 (VIN: CP1F29W27796) 2016 YALE / ERP035VT (VIN: G807N09340P) 2015 YALE / NR040DB (VIN: E815N02279N) ALL PERSONAL PROPERTY OF THE DEBTOR DESCRIBED HEREIN BY VEHICLE IDENTIFICATION NUMBER OR SERIAL NUMBER, AS APPLICABLE, WHEREVER SITUATED, TOGETHER WITH ALL PARTS AND ACCESSORIES	

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
				RELATING THERETO, ALL ATTACHMENTS, ACCESSORIES AND ACCESSIONS THERETO OR THEREON, ALL REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS OF ALL OR ANY PART OF THE FOREGOING AND ALL PROCEEDS IN ANY FORM DERIVED THEREFROM.	
De Lage Landen Financial Services Canada Inc.	Injection Technologies Inc.	786642066 – 20220913 1037 1529 5221 (6 years)	Equipment, Accounts, Other, Motor Vehicle	2018 UNICARRIERS / PF60LP (VIN: UG1F29L22068) ALL PERSONAL PROPERTY OF THE DEBTOR DESCRIBED HEREIN BY VEHICLE IDENTIFICATION NUMBER OR SERIAL NUMBER, AS APPLICABLE, WHEREVER SITUATED, TOGETHER WITH ALL PARTS AND ACCESSORIES RELATING THERETO, ALL ATTACHMENTS, ACCESSORIES AND ACCESSIONS THERETO OR THEREON, ALL REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS OF ALL OR ANY PART OF THE FOREGOING AND ALL PROCEEDS IN ANY FORM DERIVED THEREFROM.	
BMW Canada Inc.	Injection Technologies Inc Duane Humphries (Dob: 13may1974) Duane C Humphries (Dob: 13may1974)	790425576 – 20230201 0824 1532 9814 (5 years)	Consumer Goods, Equipment, Other, Motor Vehicle (Amount Secured: \$99,944)	2023 BMW X3 M40I (VIN: 5UX83DP06P9P87449)	
Chillers Inc.	Injection Technologies Inc.	791751591 – 20230324 1413 2595 0509 (2 years)	Equipment (Amount Secured:	ADVANTAGE SENTRA WATER TEMPERATURE CONTROLLERS? (2) EACH OF SK-1035-G 575 VOLT (2) EACH OF SK-1075-G 575 VOLT	20230502 0956 2595 0510 – Discharge

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
			\$17,026)		
De Lage Landen Financial Services Canada Inc.	Injection Technologies Inc.	793131525 – 20230509 1040 1529 2700 (4 years)	Equipment, Accounts, Other, Motor Vehicle	2022 ATLAS COPCO / GA37+125FF (VIN: API443071) ALL PERSONAL PROPERTY OF THE DEBTOR DESCRIBED HEREIN BY VEHICLE IDENTIFICATION NUMBER OR SERIAL NUMBER, AS APPLICABLE, WHEREVER SITUATED, TOGETHER WITH ALL PARTS AND ACCESSORIES RELATING THERETO, ALL ATTACHMENTS, ACCESSORIES AND ACCESSIONS THERETO OR THEREON, ALL REPLACEMENTS, SUBSTITUTIONS, ADDITIONS AND IMPROVEMENTS OF ALL OR ANY PART OF THE FOREGOING AND ALL PROCEEDS IN ANY FORM DERIVED THEREFROM.	
Borch Plastic Machinery Inc.	Injection Technologies Inc.	793937268; 20230602 1107 1590 6093 (5 years)	Equipment	BU600T-660 US TON, TWO PLATEN SERVO INJECTION MACHINE, FULLY LOADED, BU600, TRANSFORMER FOR 80T BE 120-T-132T ALL ELECTRIC INJECTION MOLDING MACHINE FULLY LOADED BE120T TRANSFORMER FOR 120T BUT1650T-1815 US TON, BORCHE TWO PLATEN ULTRA MAX SERIES, FULLY LOADED (BU1650) ADD T SLOTS TO SPI SPECIFICATION PLATEN 16 ZONE VALVE GATE CONTROLLER(X16) INDEPENDENT HYDRAULIC STATION FOR VALVE GATE (MULE) 575V ISOLATED DELTA-WYE TRANSFORMER ELECTRIC DRIVE AND ELECTRIC MOTOR SHUT OFF NOZZLE ROBOT FOR BU1650T(MBW-200II-200-23-PIN-30TR) UPGRADE TO BU-V FROM BU-III BU600T-660 US TON, TWO PLATEN SERVO INJECTION MACHINE, FULLY LOADED BU600(X2) TRANSFORMER FOR 600T (X2) ROBOT FOR BU600T(X2)	

The ITI GSA and the Bank’s interest in the equipment leased under the Master Lease Agreement is perfected by the above registration under the PPSA in favour of the Bank dated June 4, 2021, as well as by the various property-specific registrations in favour of the Bank.

The assets subject to the security interest held by De Lage Landen Financial Services Canada Inc. were not included in any transaction completed by the Receiver.

The Plastics GSA

We have reviewed the Plastics GSA. The Plastics GSA is enforceable on its face, attachment having occurred pursuant to the provisions of the PPSA on the date of execution by Plastics and the advance of funds by the Bank to Plastics.

The Plastics GSA grants a continuing security interest in all of Plastics’ present and after acquired personal property and undertaking including, without limitation, Inventory, Equipment, Accounts and Debts, and Intellectual Property (all as defined therein), and all intangibles.

A certified PPSA search current to December 10, 2023 as against Plastics shows the following registration:

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
The Toronto-Dominion Bank	Moldco Plastics Inc.	77310047 – 20210604 1422 1590 4008 (5 years)	Inventory, Equipment, Accounts, Other, Motor Vehicle		

The Plastics GSA is perfected by the above registration under the PPSA in favour of the Bank dated June 4, 2021.

Prior Registrations – Moldco Inc.

We note that there are several prior-in-time registrations as against Plastics under its prior name of “Moldco Inc.”. These include a general security registration in favour of Bank of Montreal dated March 3, 2023. The Receiver has confirmed that the debt relating to this security interest and registration has been satisfied.

There is also a prior-in-time general security registration in favour of 2013 Gary Paul Cluthe Family Trust (“**Cluthe**”) (Inventory, Equipment, Accounts, Other) dated March 11, 2020. Cluthe did not amend its registration following Plastics’ change of name on January 29, 2021.

Finally, there is a registration dated June 24, 2020 in favour of CWB National Leasing Inc. in relation to a specific vehicle. This asset/lease was bought out by the Receiver from CWB.

The Holdings GSA

We have reviewed the Holdings GSA. The Holdings GSA is enforceable on its face, attachment having occurred pursuant to the provisions of the PPSA on the date of execution by Holdings and the advance of funds by the Bank to Holdings.

The Holdings GSA grants a continuing security interest in all of Holdings' present and after acquired personal property and undertaking including, without limitation, Inventory, Equipment, Accounts and Debts, and Intellectual Property (all as defined therein), and all intangibles.

A certified PPSA search current to December 10, 2023 as against Holdings shows the following registration:

Secured Party(ies)	Debtor(s)	Reference File No. & Registration Number (Registration Period)	Collateral Classification	General Collateral Description	Amendment/Assignment Discharges/Renewals Transfer/Subordinations
The Toronto-Dominion Bank	Moldco Holdings Inc.	773170092 – 20210604 1424 1590 4009 (5 years)	Inventory, Equipment, Accounts, Other, Motor Vehicle		

The Holdings GSA is perfected by the above registration under the PPSA in favour of the Bank dated June 4, 2021.

D. Summary

In summary, and subject to the foregoing, we can provide the following opinion subject to the below noted Assumptions and Qualifications:

1. The GSAs are attached, perfected and enforceable as against the Debtors, and create a valid and registered security interest granted by the Debtors to the Bank in the collateral described therein, subject to our comments regarding the prior registrations as against "Moldco Inc.", including that of Cluthe;
2. The Bank's interest in the collateral set out in the Master Lease Agreement, the Specific Security Agreements, and the Lease Documents is attached, perfected and enforceable as against ITI, and creates a valid and registered security interest granted by ITI to the Bank in the collateral described therein;
3. The GSAs, Specific Security Agreements, the Master Lease Agreement, and the Lease Documents are each subject to the charges under the Appointment Order and any statutory or other deemed trust(s) that may stand in priority to same.

Yours truly,

HARRISON PENSA ^{LLP}

A handwritten signature in black ink, appearing to be 'TCH' with a stylized flourish.

Timothy C. Hogan
TCH/cc

SCHEDULE "A"

ASSUMPTIONS

A. Authenticity and Accuracy

We have assumed the genuineness of all signatures, the legal capacity at all relevant times of any natural persons signing any documents and the authenticity and completeness of all documents submitted to us as copies thereof. We have also assumed the accuracy and currency of all indices, filing and registration systems maintained at the public offices where we have searched or inquired or have caused searches or inquiries to be conducted, as set forth herein, the reliability of all search results obtained by electronic transmission and the accuracy of the result of any printed or computer search of any office of public record.

B. Capacity

We have assumed that the Debtor (and where applicable third parties executing guarantees and other agreements) had the requisite capacity to enter into and perform its obligations under each of the documents as set out in the report (the "**Documents**") at the time each of the Documents were executed and delivered.

C. Security Documents

We have assumed that:

- (a) none of the Documents have been assigned, released, discharged or otherwise impaired, either in whole or in part by the Bank and there are no agreements (other than the Documents) between the Debtor and the Bank that are relevant to the matters discussed in this letter; and
- (b) none of the assets charged by the security agreements are property for which conflicts rules provide that charges or security interests in such property are governed by the laws of a jurisdiction other than the Province of Ontario.

D. Existence of Debt and Security Matters

We have assumed that:

- (a) value has been given by the Bank to the Debtor and payment and other obligations remain outstanding by the Debtor to the Bank;
- (b) each of the Documents was duly executed and delivered by the Debtor;
- (c) each of the Documents was issued for valuable consideration and that all of the conditions precedent contained in each of the Documents, if any, were satisfied or waived;

- (d) attachment of the security interests constituted by the Documents have occurred within the meaning of the PPSA;
- (e) the Debtor has an interest in the collateral expressed to be subject to each of the Documents;
- (f) insofar as any obligation under any of the Documents is to be performed in any jurisdiction outside the Province of Ontario, its performance will not be illegal or unenforceable by virtue of the laws of that other jurisdiction;
- (g) the Collateral subject to the security agreements does not include consumer goods (as defined in the PPSA); and
- (h) we have relied, without independent verification, upon matters of fact certified by public officials;
- (i) any security assigned was done so with proper and legal notice to the Debtor.

E. Factual Matters

We have assumed that no fact exists, or has existed, which would entitle the Debtor to assert or obtain a remedy at law or in equity (such as, without limitation, rectification, rescission or release from a contract through frustration) affecting the validity, legality, binding effect or enforceability of any of the Documents.

F. Entire Agreement

We have assumed that there is no written or oral agreement or other understanding and there is no trade usage or course of conduct or prior dealing, which would vary the interpretation or application of any term or condition of any of the Documents, and there have been no amendments, restatements, deletions or other modifications to any of the Documents.

G. Choice of Laws

We have assumed that the governing law of each of the Documents is the law of the Province of Ontario. Where the Province of Quebec is the governing law no opinion is provided.

QUALIFICATIONS

A. Title

We express no opinion concerning title to any property that proposes to be subject to any security constituted by the Documents and such title has been assumed to the full extent necessary to express the opinion contained herein.

B. Enforceability

All opinions which expressly or by necessity relate to the enforceability of the Documents (which, as used in this Schedule and as the context may require, includes validity, legality and binding effect) are subject to:

- (a) applicable bankruptcy, insolvency, winding up, arrangement, liquidation, fraudulent preference and conveyance, reorganization, moratorium and realization laws and other similar laws (including, without limitation and notwithstanding any specific references herein, provisions of the PPSA) at the time affecting the rights and remedies of creditors generally;
- (b) equitable limitations on, and defences against, the availability of remedies and equitable principles of application to particular proceedings at law or in equity and no opinion is expressed regarding the availability of any equitable remedy (including those of specific performance and injunction), which remedies are only available in the discretion of a court of competent jurisdiction;
- (c) the power of a court to grant relief from forfeiture;
- (d) applicable laws regarding the limitation of actions;
- (e) the court's powers to stay proceedings and execution of judgments;
- (f) the court's discretion to decline to hear any action or give effect to an obligation if to do so would be contrary to public policy or if it is not the proper forum to hear such action;
- (g) limitations which may be imposed by law or equity on the effectiveness of terms exculpating a party from a liability or limiting the liability of a party;
- (h) limitations upon the right of a creditor to receive immediate payment of amounts stated to be or which may become payable on demand;
- (i) limitations upon the right of a party to enforce a provision based upon a minor or non-substantive default;
- (j) implied obligations requiring good faith, fair-dealing and reasonableness in performance and enforcement of a contract; and

- (k) any requirement that "interest", as defined in section 347 of the *Criminal Code* (Canada), be paid at an effective annual rate in excess of 60% is not enforceable; and
- (l) the fact that a court may require that a debtor be given a reasonable time to repay following a demand for payment and prior to taking any action to enforce any right of repayment or before exercising any of the rights and remedies expressed to be exercisable in any of the Documents.

We express no opinion as to the enforceability of any provision of the Documents:

- (a) which purports to waive all defences which might be available to, or constitute a discharge of the liability of the grantor thereof;
- (b) to the extent it purports to exculpate the holder thereof, its agents or any receiver, manager or receiver-manager appointed by it from liability in respect of acts or omissions which may be illegal or fraudulent or which may involve wilful misconduct;
- (c) which states that amendments or waivers of or with respect to the Documents that are not in writing will not be effective;
- (d) which requires any person to pay, or to indemnify another person of, the costs and expenses of such other person in connection with judicial proceedings, since those provisions may derogate from a court's discretion to determine by whom and to what extent those costs should be paid; and
- (e) provisions contained in the Documents which purport to sever any provision which is prohibited or unenforceable under applicable law without affecting the enforceability or validity of the remainder of that Document may be enforced only in the discretion of a court.

A receiver or receiver and manager appointed pursuant to the provisions of the Documents may, for certain purposes, be treated by a court as being the agent of the holder thereof and not solely the agent of the grantor thereof, as applicable, and the holder thereof may not be deemed to be acting as the agent and attorney of such grantor in making such appointment, notwithstanding any agreement to the contrary.

The obligations of the parties to the Documents and the enforceability thereof are subject to qualifications which, by law, equity or usage, are incidental thereto by their nature, including, without limitation:

- (a) the parties must have exercised and must continue to exercise good faith in the negotiation, implementation and enforcement of the Documents; and
- (b) the *Currency Act* (Canada) pursuant to which a court in Canada will render judgment only in lawful money of Canada.

B. Limitations

We have made no investigation in respect of the requirements prescribed in Part IV of the *Financial Administration Act* (Canada) relating to the assignment of federal Crown debts. An assignment of federal Crown debts which does not comply with that Act is ineffective as between the assignor and the assignee and as against the Crown. Consequently, the Documents cannot validly charge federal Crown debts unless that Act is complied with.

C. Special Property, Security Interests and Registrations

1. Special Property

We express no opinion as to whether a security interest may be created in:

- (a) property consisting of a receivable, licence, approval, privilege, franchise, permit, lease or agreement (collectively, "**Special Property**") to the extent that the terms of the Special Property or any applicable law prohibit its assignment or require, as a condition of its assignability, a consent, approval or other authorization or registration which has not been made or given; or
- (b) permits, quotas or licences which are held by or issued to the Debtor.

We express no opinion as to any security interest or hypothec created by the Documents with respect to any property of the grantor thereof that is transformed in such a way that it is not identifiable or traceable or any proceeds of property of such grantor that is not identifiable or traceable.

2. Security Interests and Registrations

No searches have been made:

- (a) under the *Patent Act* (Canada), the *Trade-marks Act* (Canada), the *Industrial Designs Act* (Canada), or the *Copyright Act* (Canada),
- (b) under the *Canada Shipping Act, 2001* in respect of any vessel which is registered or recorded under that Act,
- (c) under the *Canada Transportation Act* or the *Railways Act* (Ontario) in respect of any rolling stock to which the provisions of either of those Acts may apply.

Where a motor vehicle (as defined in the Regulation under the PPSA), situate in the Province of Ontario, is sold other than in the ordinary course of business by the Debtor, and the motor vehicle is classified as "equipment" of the Debtor, a purchaser may take the motor vehicle free from any security interests created by the Documents in any such motor vehicles unless the Vehicle

Identification Numbers of the motor vehicles are set out in the PPSA registrations in favour of the Bank unless the purchaser knew that the sales constituted a breach of the Documents.

None of the Documents have been registered so as to protect and preserve any security interest, hypothec, mortgage or charge thereof against nor have we searched for any encumbrances created by the Debtor on any ship, or as against any coal, mineral, placer, mining or petroleum and natural gas lease, license or claim, owned or which may be acquired by the Debtor. Accordingly, any hypothecs, security interests and mortgages on such property will be subject to the rights of third parties who at any time acquire and perfect or render opposable to third parties an interest in those assets.

D. Collateral

No opinion is given as to as to the priority of any security interest created by the Documents, as to whether the grantor of any Document has title to or any right in any collateral or property purported to be subject to the Documents, or as to the completeness or accuracy of any description of such collateral. Accordingly, no opinion is given as to the effectiveness of the security as security, where effectiveness depends on title or description of the property purported to be charged or assigned, as the case may be.

E. Searches

We have only searched against the Debtor. We have not conducted any land titles office or other searches with respect to encumbrances against real property or any interests therein or any statutory lien, court registry or other searches.

F. Choice of Law

We have made no investigation of the laws of any jurisdiction other than, and our advice is confined to, the laws of the Province of Ontario and the federal laws of Canada applicable therein.

G. Maintaining Perfection

We express no opinion with respect to maintaining perfection of any security interest created by any of the Security Documents.

H. Priority

1. No opinion is expressed as to the rank or priority, or as to the effect of perfection or opposability to third parties on the rank or priority, of any security interest, mortgage or charge created by any of the Documents.

APPENDIX "L"

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

IN THE MATTER OF THE RECEIVERSHIP OF
INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC
(the “Debtors”)

**AFFIDAVIT OF JORDEN SLEETH
(Sworn December 20, 2023)**

I, **Jorden Sleeth**, of the Town of Oakville, in the Province of Ontario, **MAKE OATH AND SAY:**

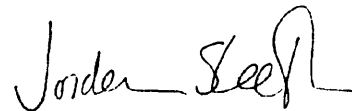
1. I am a Senior Vice-President with Deloitte Restructuring Inc. (“**Deloitte**”) in its capacity as Receiver and Manager of the assets, undertakings and properties of the Debtors pursuant to an order of the Court dated May 26, 2023 and as such, have knowledge of the matters to hereinafter deposed to.
2. Attached hereto as Exhibit “**A**” is a schedule summarizing each invoice attached hereto in Exhibit “**B**”, the total billable hours charged per invoice, the total fees charged per invoice and the average hourly rate charged per invoice.
3. Exhibit “**B**”, is a true copy of the invoices issued by Deloitte for fees and disbursements incurred during the Debtors’ receivership proceedings between May 24 and December 2, 2023. The total fees charged by Deloitte during that period were \$1,792,088, plus disbursements of \$47,476, plus Harmonized Sales Tax (“**HST**”) in the amount of \$239,144 for a total of \$2,078,708.
4. Accordingly, I verily believe that the total fees, disbursements, administration fees and HST as at the date of Receiver’s Second Report are \$2,078,708.
5. Attached hereto as Exhibit “**C**” is a schedule summarizing the respective billing rates of each of the representatives at Deloitte who acted during the receivership.

6. To the best of my knowledge, the rates charged by Deloitte throughout the course of this proceeding are comparable to those charged by other firms in Toronto for the provision of similar services.
7. The hourly billing rates outlined in Exhibit "C" to this affidavit are comparable to the hourly rates charged by Deloitte for services rendered in similar proceedings.
8. I make the affidavit in support of a motion by the Receiver for, among other things, approval of the fees and disbursements of the Receiver and its counsel.

SWORN BEFORE ME via video-conference
This 20th day of December, 2023.



A Commissioner for taking Affidavits (or as may be)



JORDEN SLEETH

Note: This affidavit was commissioned via simultaneous video-conference in accordance with the *Commissioners for taking Affidavits Act*, R.S.O. 1990, CHAPTER C.17, and the Law Society of Ontario: COVID-19 Response Statement interpretation of that Act, under which (i) the identity of the deponent was confirmed from government issued identification, (ii) the commissioner administered the oath or affirmation, (iii) the deponent affixed their electronic signature to the affidavit and transmitted the full electronic affidavit, as sworn or affirmed, including exhibits to the commissioner, (iv) the deponent confirmed their electronic signature to the commissioner, (v) the commissioner affixed their electronic signature to the affidavit including exhibits.

This is Exhibit "A" referred to in the Affidavit of Jordan Sleeth sworn December 20, 2023

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal stroke, positioned above a horizontal line.

Commissioner for Taking Affidavits (or as may be)

Exhibit "A"

**In the matter of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc. (the "Debtors")**

Summary of the fees and disbursements of Deloitte Restructuring Inc. in its capacity as Receiver of the Debtors.
For the period May 24 to December 2, 2023

Invoice #	Period		Hours	Fees	Disbursements	Subtotal	HST	Total	Avg Hrly Rate
	Start	End							
8003777529	24-May-23	31-May-23	343	\$ 149,177.50	\$ -	\$ 149,177.50	\$ 19,393.08	\$ 168,570.58	\$ 434
8003777530	1-Jun-23	16-Jun-23	711	\$ 304,384.50	\$ 4,035.22	\$ 308,419.72	\$ 40,094.56	\$ 348,514.28	\$ 428
8003807398	16-Jun-23	1-Jul-23	584	\$ 252,110.00	\$ 5,567.82	\$ 257,677.82	\$ 33,498.12	\$ 291,175.94	\$ 432
8003860866	3-Jul-23	29-Jul-23	888	\$ 389,799.50	\$ 12,282.10	\$ 402,081.60	\$ 52,270.61	\$ 454,352.21	\$ 439
8003935414	30-Jul-23	26-Aug-23	778	\$ 342,135.00	\$ 11,749.41	\$ 353,884.41	\$ 46,004.97	\$ 399,889.38	\$ 440
8004058349	27-Aug-23	30-Sep-23	585	\$ 219,186.50	\$ 8,997.47	\$ 228,183.97	\$ 29,663.92	\$ 257,847.89	\$ 375
8004157674	1-Oct-23	28-Oct-23	246	\$ 79,983.50	\$ 3,046.66	\$ 83,030.16	\$ 10,793.92	\$ 93,824.08	\$ 325
8004234575	29-Oct-23	2-Dec-23	160	\$ 55,311.50	\$ 1,797.56	\$ 57,109.06	\$ 7,424.18	\$ 64,533.24	\$ 345
Total			4,295	\$ 1,792,088.00	\$ 47,476.24	\$ 1,839,564.24	\$ 239,143.35	\$ 2,078,707.59	\$ 417

This is Exhibit “**B**” referred to in the Affidavit of Jordan Sleeth sworn December 20, 2023

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

Commissioner for Taking Affidavits (or as may be)



Invoice 8003777529

Deloitte LLP

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: July 14, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 133245290RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc., Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the receivership order dated May 26, 2023 for the period May 24, 2023 to May 31, 2023.

Please see attached appendix for details.

Sales Tax

HST applicable 149,177.50

HST at 13.00 % 19,393.08

Total Amount Due (CAD) 168,570.58

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8003777529	168,570.58	Payment for invoice 8003777529

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	39.7	725.00	28,782.50
Damiani, Stefano	Director	47.5	605.00	28,737.50
van Aphen, Wendy	Senior Manager - Contractor	60.9	525.00	31,972.50
Brown, Rose	Manager - Trust Accounting	4.5	325.00	1,462.50
O'Neill, Sandi	Manager - Consultant	42.7	350.00	14,945.00
Messina, Stephen	Senior	30.0	295.00	8,850.00
Pandit, Arpana	Senior	30.0	295.00	8,850.00
Cestnick, Winston	Analyst	34.5	250.00	8,625.00
Conorton, Laura	Analyst	2.6	250.00	650.00
Casey, Brian	Senior Manager - Data Preservation	8.5	525.00	4,462.50
Pardinas, Elijah	Senior - Data Preservation	27.0	295.00	7,965.00
Garcia, Andy	Analyst - Data Preservation	15.5	250.00	3,875.00
Total Professional Hours and Fees		343.4		149,177.50
Out-of-pocket Expenses				-
Total Fees and Expenses (CAD)				149,177.50



Appendix #2

Work performed from May 24, 2023 to May 31, 2023

Date	Name	Narrative	Hours
5/24/2023	O'Neill, Sandi	Planning: TCT Essex County Locksmith - check on availability for Friday; TCT Paladin Security for availability for Windsor and Kitchener for Friday and to receive quotes for approval; Email Stefano and Wendy to get approval to email Paladin details of what is needed; Do up notice for doors - email Wendy for changes; Email from Stefano re locksmith in Kitchener; TCT Rocco to check on availability for Friday; Email from Stefano to email Rocco name an address for Kitchener; Email Paladin suggested times and confirmation of our phone conversation	3.0
5/25/2023	Brown, Rose	Discuss regarding opening account with JS/SD, prepare draft documents.	0.7
5/26/2023	Brown, Rose	Account open documentation, prepare, have signed and send to TD Bank. Set up accounts on Ascend.	2.0
5/26/2023	Messina, Stephen	On site in Kitchener for employee meetings, changing of the locks, removal of fob access and coordination of security.	6.2
5/26/2023	Cestnick, Winston	On-site attendance at Kitchener location. Met with management to discuss current operations, work flow, and incoming shipments, the receivership and associated termination and retention; met with production staff to discuss receivership and associated termination and retention. Answered discussions, emails, and calls from various suppliers, customers, and employees with respect to the receivership process.	7.0
5/26/2023	Cestnick, Winston	Call with Wendy van Alphen regarding the process of identifying what products will continue to be produced at the Kitchener location. Developed excel spreadsheet identifying production required, production targets, feasible production, and associated cost.	3.5
5/26/2023	Pandit, Arpana	Site Visit. Attending employee meeting. Meeting with HR on the WEPPA calculation and follow up information required.	6.2
5/26/2023	Sleeth, Jordan	Prepare for and attend court hearing; first day take possession activities; update to TD; calls with customers and suppliers; email memo to team re: priorities.	8.3
5/26/2023	Casey, Brian	On-Site forensic client assessment. Collections and meetings re back up priorities and strategy.	6.0
5/26/2023	Pardinas, Elijah	On-site collections and preservation tasks.	6.2

Date	Name	Narrative	Hours
5/26/2023	van Aphen, Wendy	Attendance on site; review production forecast; direction and review of offer letters; meeting with MGT regarding announcement of receivership; calls with customers: Rollstamp; Maco; Skyjack; CLEK; KB Components; Cashflow prep; production forecast for Kitchener and Windsor and supervision of same; answering employee questions; meeting with security guard.	13.0
5/26/2023	O'Neill, Sandi	Windsor onsite: meet Wendy, Duane, Pam; Email Wayne Bodard - PC Outfitters to come in and help; Meeting with management staff and Dwayne to discuss receivership - answer questions; Meet with Wayne at Plant 1 - go over duties and what is required; Discuss mail merge and excel spreadsheet with Debra; monitor shipments going out - take pictures and sign off; Travel to Plant 2 - meet with Debra to go over employee lists - Windsor and Kitchener; Print up court order and counsel slip - 5 copies each; Print up termination letters (80); Travel back to Plant 1 - read, review and print offer letters with Debra; Send letters back to Wayne for changes - bi-weekly to weekly for Windsor - send back to Debra for printing; Prepare for meeting with employees - termination letters, etc.; Received laptops from Deloitte - work with Wayne to set up - having issues; Meet with Essex County Locksmith - walk around building for # of padlocks and doors; Put up receivership signs on doors; Travel to Plant 2 - meet with Essex County Locksmith to change locks on doors and padlocks for bay doors; Email and print up WEPP information letter for employees (75) for Monday; TCT Paladin again - still waiting on confirmation for security that night; Travel back to Plant 1; Paladin still not responding - TCT Elite Security for back up plan - spoke to Pete to set up security for the weekend - email what is needed and send Deloitte's billing info; Print stamped court order - save copy to email utilities, etc.; Hand out keys to Duane, Wendy and Sandi - prepare list of who has keys; Email court order to Enwin Utilities for Windsor Plant and Enova for Kitchener; Meet with Elite Security - walk around building - give key for Plant 1 and go over instructions for Plant 1 and Plant 2	10.7
5/27/2023	Cestnick, Winston	Continued developing excel spreadsheet identifying production required, production targets, feasible production, and associated costs. As well as contribution margin to identify what products are profitable and should continue to produce in receivership.	1.5
5/27/2023	van Aphen, Wendy	Review of Windsor production worksheet prepared by ITI and update for summaries; resin cost and determination of production to continue.	2.5
5/28/2023	Cestnick, Winston	Developed statement of cash flows for Inject Tech Inc. for the year ended July 31, 2022 for the purposes of collecting government funds outstanding.	3.4
5/28/2023	Sleeth, Jordan	Review and consider staffing, production, borrowing needs, liaise with S. Damiani and W. Van Alphen re: same.	2.5

Date	Name	Narrative	Hours
5/26/2023	Damiani, Stefano	Onsite attendance to take possession at the Kitchener Facility; meetings with employees; safeguarding premises; correspondence with customers; instructions re employee letters and sign same.	10.8
5/28/2023	van Aphen, Wendy	Review of Windsor production worksheet prepared by ITI and update for summaries; resin cost and determination of production to continue; review of offer letters; prep of CF stmt; discussion with Winston on CF statement and review of production schedule and update for Kitchener & Windsor.	7.5
5/28/2023	O'Neill, Sandi	Travel to Plant 1; Review emails from Jordan; Prepare retention letters for salary employees; Review retention letters for hourly employees with Wendy - make changes to letters as required; Email Stefano and Wendy for signatures; Received Kitchener's retention letters - print up and email to 7 employees; Email Stefano that two Kitchener letters are missing - try and find them on excel spreadsheet; Call 2 employees to get proper email addresses; Print signed salaried retention letter - make copies of all letters - 1 for employee one to keep once signed; Print signed hourly retention letters(65 letters) - copy same as above	7.3
5/28/2023	Damiani, Stefano	Review and sign retention offer letters to Windsor hourly and salaried employees; emails with employees; review analysis and draft email to Magna.	3.3
5/29/2023	Pandit, Arpana	Preparing Landlord details. Discussion with HR re: benefits and WEPPA claim work sheet, preparing control list for retained employees; send retention letters and responding to emails from employees.	7.8
5/29/2023	Messina, Stephen	On site in Kitchener - Prepared draft creditor listing by reading financial statements and holding discussions with Controllers; began populating the data room.	7.8
5/29/2023	Sleeth, Jordan	Onsite attendance, attending to various matters - staffing and retention discussions, calls with customers and suppliers, facility tours, internal planning and workstream allocation meetings.	10.5
5/29/2023	Cestnick, Winston	On-site at Kitchener location - call with suppliers regarding expected resin use on our purchase terms; met with retained employees in morning to confirm signed retention letters; discussions with customer (CLEK) truck arrival and coordinated inventory picking for the order; call with Wendy van Alphen to coordinate with customer CLEK; met with employees to coordinate order picking and delivery of Magna product; assisted with inventory and resin count.	9.3
5/29/2023	Garcia, Andy	Exporting file list, validating litigation hold settings, manually adding 11 users to litigation hold & blocking 1 phone, reviewing licenses.	1.5

Date	Name	Narrative	Hours
5/29/2023	Casey, Brian	Follow-up with vendors and internal team meetings re back up process.	0.5
5/29/2023	Pardinas, Elijah	On-site collections, preservations, evidence management.	6.8
5/27/2023	Damiani, Stefano	Statutory Notice and Statement of Receiver, instructions to S. Messina on same; call with D. Humphries re staffing; instructions to S. Messina re cash flow forecast; amend sale process documents; marketing teaser; emails.	5.9
5/29/2023	van Aphen, Wendy	Customer calls: Magna-Rollstamp; Clek; Skyjack; IMMED; Cavalier Tools; review shipping of product and tryouts; obtain information related to production; costs and profits; review with Robin & Winston; review of payroll ledger.	12.8
5/29/2023	O'Neill, Sandi	Retention letters - revise and print, shred old retention letters; Prepare and organize to meet with employees - hand out retention letters and WEPP handout; Meeting with Lois regarding procedure for shipments coming in and out - picture taking, shipping labels; Approve shipments going out all morning; Meet with employees and HR - Debra - hand out retention letters, WEPP handout and answer questions; Leave for personal Doctor's appointment; Finish retention letters with employees and Debra on afternoon shift; Travel to Plant 2 for staff there and their retention letters; Travel bank to Plant 1; Approve shipments going out; Speal to Pam-Office Manager - to obtain list of company phones, phone numbers, door codes; Work with Lois on issue with shipment going out to Integrity-ABC - packaged wrong- have staff call customer for clarification - rebox package before shipping out and signing off; Obtain information for Stephen regarding security cameras - none in Kitchener - Unique Communications installed cameras in Windsor - Windsor staff monitors for problems; Obtain address and phone number for 1 employee from Kitchener for Arpan; Email IT Team at Deloitte advising Wendy and my Deloitte computers are up and running; Check in with Debra regarding status of payroll - finished - sent to Wendy for approval	0.7
5/30/2023	Messina, Stephen	On site in Kitchener - Finalized Creditor listing; contacted and toured property with janitorial vendor; contacted waste management provider; inventory serial numbers on certain equipment assets.	8.4
5/30/2023	Garcia, Andy	Project Molds - Onsite client collection/preservation and evidence management of roughly 16 priority devices. Placing priority devices back to custodian offices.	8.5
5/30/2023	Sleeth, Jorden	Onsite attendance, attending to various matters - staffing and retention discussions, calls with customers and suppliers, facility tours, internal planning and workstream allocation meetings; draft update to TD and host update call with TD and counsel; call with TD Windsor branch re: potential buyers.	10.0

Date	Name	Narrative	Hours
5/30/2023	Cestnick, Winston	On site attendance at Kitchener location - created inventory tracking list, developed priority inventory picking and organized shop staff, signed off on shipments, check order picking before shipments, team call on production priorities; further developed production schedule, summarized outgoing delivery schedules, pulled AR and finished goods inventory information for creditors, calls with creditors and customers on receivership & process.	9.8
5/30/2023	Casey, Brian	Follow-up with vendors and internal team meetings re back up process.	1.0
5/30/2023	Pardinas, Elijah	On-site collections, preservations, evidence management.	8.5
5/30/2023	Pandit, Arpana	Preparing retention letters; discussion with HR on WEPPA work sheet, arranging employee attendances in Kitchener to retrieve personal belongings, responding to queries of employees, working on WEPPA sheet for Kitchener and Windsor.	8.4
5/29/2023	Damiani, Stefano	Onsite attendance at Kitchener; Inventory count, instructions to Moldco employees re resin and finished goods; review landlord letter, emails with counsel on same; emails with Corporate Finance; production analysis and calls; Magna shipment release; conference call and emails with Insurance Broker (John Thrasher - NFP); employee letters.	9.7
5/30/2023	Damiani, Stefano	Onsite attendance at the Kitchener plant; draft letter to Windsor tryouts customers, emails with T. Hogan (Harrison Pensa) on same; emails with Insurance Broker; meeting with M. Bottero (Landlord); meetings with Controller re cash, A/R; instructions to shipping staff; debrief call with TD and counsel; inventory instructions; sign employee retention letters; customer negotiations; statutory notices and statement of receiver, comments to S. Messina.	9.4
5/30/2023	van Aphen, Wendy	Attendance on site; discussions with customers: Skyjack, Clek, Solist, Broda, Calalier; Circle 5; direction to employees regarding processes; update to cashflow regarding resin purchases; discussion with suppliers (resin) and potential buyers; sent of NDA's; update buyers listing; update call with group.	11.9

Date	Name	Narrative	Hours
5/30/2023	O'Neill, Sandi	Travel to Plant 1 to open shop; Open all exterior doors and bay doors; Collect retention letters from employees - answer more questions; Discuss shipment with Cavalier - waiting to pick up - review paperwork; Travel to Plant 2 to open shop; Meet with employee and hand out and discuss retention letter; Travel back to Plant 1; Go through list of employees and mark off retention letters received; Call Debra re payroll ok to go through and to bring retention letters from yesterday, staffing issues; TCT Enwin Utilities - spoke to Nadine re final metre readings at both plants; Approve shipment going out; Meet with Debra to complete retention letters and payroll; Get info from Pam/Debra for WEPP; Approve shipment going out; Review letters for 2 employees re employment status and immigration status; Gather company credit cards; call Debra for Mike Foulon's retention letter and credit card at Plant 2; Approve shipment going out; TCT Enbridge, MNSI and Damar re receivership - obtain info needed to send to them with court order; Gather afternoon shift's retention letters from Luanne; Meet with Ryen Goebel - explain and give termination letter, retention letter, WEPP; Update employee retention list	10.8
5/31/2023	Conorton, Laura	OSB Filing and creditor labels	2.6
5/31/2023	Pandit, Arpana	Preparing retention letters; review and update WEPPA worksheet, calculate severance and accrued vacation pay, preparing pre populated PoCs and cover letters for employees, monitoring pickups by employees; discussions re: payroll with HR.	7.6
5/31/2023	Brown, Rose	Review creditor listings and update before importing into Ascend. Check balance to draft 246 and discuss with SM final notices when we will receive. Reply to SD regarding wires. Prepare envelopes for mailing.	1.8
5/31/2023	Cestnick, Winston	On site attendance at Kitchener location - opened location for morning shift staff, coordinated machine start up, discussed production plan with staff, order picking priority, inventory count priority, and outgoing orders for the day; calls with customers and creditors regarding receivership process and recovery of property, discussion with employees regarding resignation/replacement/timing, continued inventory counts of priority products; coordinating maintenance employees to fix, discussion with vending machine vendor on requirements, discussion with trailer vendor on requirements and process, coordinated repair and restart of operating machine 1; signed off on outgoing orders, double checked outgoing order counts, calls with creditors and customers regarding receivership process.	
5/31/2023	Garcia, Andy	Onsite collection and inventory + evidence management for 16 devices.	5.5

Date	Name	Narrative	Hours
5/31/2023	Sleeth, Jordan	Onsite attendance, attending to various matters - staffing and retention discussions (Maintenance, engineering), calls with customers and suppliers, facility tours, review CLEK inventory and pricing; call with M. Fiore re: buyer list; call with prospective purchasers; draft update to TD and host update call with TD and counsel; review and revise 245/246 notices.	8.4
5/31/2023	Messina, Stephen	On site in Kitchener - various team meetings; arrange tours with liquidators; prepare data room documents for review; various staff meetings; inventory certain equipment.	7.6
5/31/2023	Casey, Brian	Follow-up with vendors and internal team meetings re back up process.	1.0
5/31/2023	Pardinas, Elijah	On-site collections, preservations, evidence management.	5.5
5/31/2023	Damiani, Stefano	Onsite attendance at Kitchener; production planning meetings; emails with counsel re lease matter; telephone and email correspondence with Landlords; customer communications; review daily cash report, instructions to Controller.	8.4
5/31/2023	van Aphen, Wendy	Various calls with customer (Prototec, Skyjack, Etonymic, Armadillo etc.); review of payroll; discussion with resin companies (Ineo, Chase, Formerra, The Materials Group, Audia), update to cashflow; review of customer release agreements; calls with Cavalier, RMS Inc.	13.2
5/31/2023	O'Neill, Sandi	Travel to Plant 1 to open up shop; Open all exterior and bay doors; Approve drop off from Arlene Tool; Update address change for employee for WEPP - email Arpan; Approve shipment - drop off and pick up; Travel to Plant 2 to open up shop; Travel back to Plant 1; Approve shipments - drop off and pick up-5; Approve shipments going out - 4; Received 2 more retention letters and update employee list; Meeting with Steve Burns and Wendy regarding list of resin at Plant 2; Meeting with Wendy - she is going to Kitchener Thursday and Friday; go over things that need to get done at Windsor Plant; Email Pete and Elite Security- change hours effective tomorrow for service to start at 6:00 pm instead of 11:00 pm; Email Damar Security re sprinkler system court order and to continue service; Approve shipment going out - 3; Approve shipment going out; Email MNSI court order and information to continue service; Print up new retention letter for Duane Humphries; Get stuff ready for Wendy to take to Kitchener tomorrow; TCT Rogers for phones and internet for Kitchener to send info on receivership; Approve shipment going out; Meet with employee Tricia to go over retention letter and WEPP; Received 1 more retention letters and update employee list; Answer questions from employees re benefits, overtime and payroll; Approve shipment going out; TCF Enbridge re receivership - email info required to change accounts.	10.2
Total			343.4



Invoice 8003777530

Deloitte LLP

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: July 14, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 133245290RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc., Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the receivership order dated May 26, 2023 for the period June 1, 2023 to June 16, 2023.

Please see attached appendix for details.

HST applicable 304,384.50

Expense

Out-of-pocket Expenses:

- Mileage 3,148.43
- Accommodations 886.79

HST applicable 4,035.22

Sales Tax

HST at 13.00 % 40,094.56

Total Amount Due (CAD) 348,514.28

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8003777530	348,514.28	Payment for invoice 8003777530

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	62.0	725.00	44,950.00
Damiani, Stefano	Director	107.3	605.00	64,916.50
van Alphen, Wendy	Senior Manager - Contractor	153.7	525.00	80,692.50
Brown, Rose	Manager - Trust Accounting	4.8	350.00	1,680.00
O'Neill, Sandi	Manager - Consultant	82.0	350.00	28,700.00
Messina, Stephen	Senior	93.8	295.00	27,671.00
Pandit, Arpana	Senior	66.1	295.00	19,499.50
Cestnick, Winston	Analyst	117.3	250.00	29,325.00
Conorton, Laura	Analyst	7.0	250.00	1,750.00
Casey, Brian	Senior Manager - Data Preservation	3.5	525.00	1,837.50
Pardinas, Elijah	Senior - Data Preservation	2.5	295.00	737.50
Garcia, Andy	Analyst - Data Preservation	10.5	250.00	2,625.00
Total Professional Hours and Fees		710.5		304,384.50
Out-of-pocket Expenses				4,035.22
Mileage			3,148.43	
Accommodations			886.79	
Total Fees and Expenses (CAD)				308,419.72



Appendix #2

Work performed from June 1, 2023 to June 16, 2023

Date	Name	Narrative	Hours
6/1/2023	Sleeth, Jorden	Onsite attendance - calls with customers (CLEK), arranging customer tours re: tools and inventory counts; review cash flow; internal planning meetings; review Teaser and email blast to bidders.	6.0
6/1/2023	Messina, Stephen	On site at Kitchener location. Finalized teaser for public distribution; constructed buyer list. Updated cashflow schedule. Discussed plan on managing new purchase orders and the migration of Kitchener accounting records to Sage.	7.9
6/1/2023	Casey, Brian	Follow-up with vendors and calls with onsite team.	0.5
6/1/2023	Pardinas, Elijah	Data consolidation, evidence management tasks in BAE	1.5
6/1/2023	Cestnick, Winston	On-site attendance in Kitchener - calculating and summarizing inventory on hand, archiving receivership purchase orders outgoing and internal POs made, production scheduling, calls with creditors and customers, staffing schedule and calling employees; profitability calculations based on decided production items and schedule; running production meeting, projecting weekly production and needs/staffing.	10.1
6/1/2023	Brown, Rose	Mailing and bank account updates.	2.0
6/1/2023	Pandit, Arpana	Internal discussion on WEPP worksheet; adding accrual payments to the WEPP calculation and creating mail merge for PoCs; discussion with Jeff re salary; preparing retention letters and updating the control sheet.	7.3
6/1/2023	Conorton, Laura	Creditor mailing, correspondence with OSB, trust administration	5.3
6/1/2023	van Alphen, Wendy	Production update with team regarding: inventory, scheduling; discussion with Stefano, Stephen and Cristian, regarding Sage 50; discussions with various customer regarding on hand resin; update discussion with Jorden; discussion with Autosystems regarding tool pickup and payment concerns; update with Resin supplier; direct re more hires and production scheduling of Clek; review of cashflow with Stephen; general discussions.	14.2

Date	Name	Narrative	Hours
6/1/2023	O'Neill, Sandi	Approve shipment going out; Respond to email from Enwin re final readings; Collect retention letters and update list; Approve shipment going out; Email from Steve Burns re Megal Mold and pulling resin - TCT Wendy; with Duane to discuss; Review revised WEPP vacation accrual list from Debra; TCF Wendy - forwarding email from Tony Dorta from Audia - email copy of court order to him; Approve shipment going out; Call with Wendy re resin issues, putting new policy in place for Plant 2; obtaining extra security guard, getting extra person to help Lois with tasks; Called Lois into phone meeting with Wendy - discuss new policy - discussed; AP and AR for Luanne; Call and email Peter and Elite Security re changes in time and we need another guard for Plant 2; Lois gone back to Plant 2 - approve shipments going out -3; Meet with Steve Burns and advise of 2nd security guard at Plant 2; and that security guard at Plant 1 will open doors for him in the AM; Approve shipment going out-3; Approve shipment going out -2; Disc with Lois training Laura to do shipments coming and going - walked; around with them to show her my role; Review email from Pam re disconnection notice from Enwin - forward to; Danielle Reaume to confirm disconnection won't occur; TCF Enwin - different department - wanted clarification for name on account; Approve shipment going out; Approve shipment going out; Meeting with Mike - afternoon supervisor on procedure for picture taking, etc. if no one is here to sign off if a late pick up.	11.8
6/1/2023	Damiani, Stefano	Amend marketing teaser; sign employee retention offer letters re Kitchener; review and prepare customer correspondence and attend to negotiations; instructions re shipments; review WEPPA; emails with counsel; Windsor hydro notice; conference calls; cash reporting and disbursements.	6.1
6/2/2023	Messina, Stephen	On site in Kitchener. Compile data room documents. Develop cash flow and budget template. Internal meetings re: priorities. Meetings with plant staff re: deliveries, tours. Coordinate bidder attendance at Kitchener and Windsor locations.	8.0
6/2/2023	Cestnick, Winston	On site attendance in Kitchener - opening location for day shift, upstarting production, discussions with floor team on plan for production, counts, picking, staff assignments, production planning excel development; running production meeting, projecting weekly production and needs/staffing.	9.8
6/2/2023	Conorton, Laura	Trust administration, preparing documents, filing, correspondence with OSB	0.8
6/2/2023	Brown, Rose	Update Ascend with bank accounts, Set various folders for saving of documents on Q drive and hardcopy files.	1.1

Date	Name	Narrative	Hours
6/2/2023	Garcia, Andy	Evidence management for 23 O365 mailbox searches. Creating O365 mailbox searches. 23 o365 mailbox searches created.	1.5
6/2/2023	Casey, Brian	Follow-up with vendors and calls with onsite team.	0.5
6/2/2023	Gulve, Sonali	Revisions to SISP materials.	-
6/2/2023	van Alphen, Wendy	Discussion with Autosystems Belleville; customer release 3 molds for Autosystems Belleville; direction on molds to staff; discuss with Robin and Duane re: go forward plan; review of resin purchases and approvals; discussions with Tim Hogan/SD re Autosystems Belleville release; discussion with Anna regarding inventories; discussion with Winston regarding production scheduling and planning; call with Cavalier regarding rebates and current A/R and tryouts; meeting with Raymond, review of on-hand inventories; instruction to Cristian regarding Sage 50 set up; discussion and scheduling of site visit for prospective buyer; Direction to Lois and Sandi regarding resin release proposal; several discussions with Duane regarding customer requests including KB production; approval of OT hours for Lois; direction to Winston regarding staffing; calls and resin release from Chase and Formerra; Discussion with Lino regarding collar components for Rollstamp production; several calls with Joe Latham (legal counsel) re Rollstamp; review of WEPPA for Windsor with Arpana.	14.7

Date	Name	Narrative	Hours
6/2/2023	O'Neill, Sandi	<p>Approve shipments going out; attend at Plant 2 to open shop; Travel to Plant 1; Approve shipment going out; TCT Lois re Kaelyn's job recording stuff leaving Plant 2 - new log, etc.; Meet with Dave Innes - deliver termination letter, retention letter and WEPP; Approve shipment going out; Review emails from last night; Email court order and instructions to Enbridge; Forward email from Steve Burns to Lois regarding purchase order for boxes; Go to Plant 2 - meet Kaelyn - speak to her re new policy and procedure re stuff; leaving Plant 2 to Plant 1 - recording on log sheet, etc.; Discuss supplies with Duane and Lois from Kitchener. Discussions with WVA re product returns; Approve shipment going out; TCT Enova - Kitchener's hydro company to get info on emailing court order and details; Approve shipment going out; Staff meeting; Review and print up purchase orders for Wendy to approve; Scan retention letters to Arpan to file and update list; Talk to Wendy to get approval for purchase of propane. Call Linde to explain receivership and see if they will continue service - ask Lois and Mike to do up PO; Approve shipment going out; Email Rogers - Internet for Kitchener - court order and instructions to continue service; Approve shipment going out; TCT to Adam and Linde re proposane tanks needed to order - explain receivership-LMs; Approve shipment going out; TCT Linde - spoke to someone else - got email address to send court order and instructions and order in for more propane; TCF Robert Badder re notice of receivership -advised Duane will call him back; Discussion with Duane re staff working Saturday - took list of names and times to tell; Elite Security and to have them open tomorrow morning.; Pizza luncheon with afternoon staff; Print up Pos for approval; Meet with Elite Security re crew coming in tomorrow - give him list of names.</p>	12.8
6/2/2023	Damiani, Stefano	<p>Onsite attendance at Kitchener; finalize marketing materials; conference calls with J. Thrasher (NFP) re insurance renewal; calls and emails with M. Lorenti of Rosewater (Kitchener Landlord); Autosystems (Magna) settlement agreement, correspondence with J. Latham (Goodmans) on same; correspondence with T. Hogan (Harrison Pensa); review email of McTague Law Firm re NRG litigation; review insurance details package from NFP.</p>	8.9
6/3/2023	Damiani, Stefano	<p>Onsite attendance at Kitchener; email correspondence with prospective bidders; customer correspondence re production.</p>	2.9
6/4/2023	Damiani, Stefano	<p>Email to counsel re lease matter; correspondence with prospective bidders, review NDA; emails re funding; customer correspondence; instructions to S. Messina; review cash budget and proposed disbursements.</p>	2.4
6/4/2023	Sleeth, Jordan	<p>Email review, consider Clek offer, KERP request, insurance/sprinkler issues.</p>	1.5

Date	Name	Narrative	Hours
6/5/2023	Garcia, Andy	Assigning eDiscovery Manager/Administrator permission and exporting/downloading 23 searches.	0.9
6/5/2023	Pandit, Arpana	Preparing the Proof of Claims for employees; reviewing the priority payment claim of employees and test vacation pay work sheet provided by HR; discussion with S. Damiani on the WEPP worksheet calculations; preparing retention letters and update control sheet.	7.2
6/5/2023	Messina, Stephen	On site at client location in Kitchener. Reconstructed cashflow model to provide greater detail related to our receipts and disbursements by entity. Communicated with prospective buyers, providing teaser and NDA's. Began coordinating site visits for the Kitchener and Windsor locations.	8.2
6/5/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference call with Insurance Broker, Landlord (Rosewater), Landlord counsel (Torkin Manes), and Harrison Pensa re Kitchener plant; payroll review; daily production meeting; disbursements review and emails with TD; meeting with electrical contractor, emails with Landlord on same; correspondence with prospective bidders re site visits and NDA's; instructions to S. Messina re data room; review WEPPA schedule and letter package, comments to A. Pandit on same; customer tooling matters.	9.1
6/5/2023	Sleeth, Jordan	Onsite attendance, meet with customers, circulate PoC (Borch), updates with S. Damiani, Clek offer, cash flow review; draft update memo to TD and counsel; planning meeting with S. Damiani and W. Van Alphen.	9.5
6/5/2023	Cestnick, Winston	On site attendance in Kitchener - opening at 7am - meetings with customers, overseeing production and shipping, coordinating production schedule, calling and scheduling employees, calls with prospective buyers, inventory checks and counts.	9.9
6/5/2023	van Alphen, Wendy	Attendance on site; Daily production meeting; Raymond meeting; meeting with Ford personnel; meeting with Cavalier; Resin requirements daily meeting; team recap call meeting - Deloitte team; Discussions with suppliers for continued supply: Resin suppliers; Formmera; Chase; TMG; Alumicast; Netmon; various other suppliers"; Discussions with various customers regarding continued production; Discussion with various customers re tryouts & rebates; Discussion with tooling shoppes regarding resin release and process; Review of payroll subledgers - Windsor; Set up request for payments - TD bank; Update Receiver cash flow.	12.8
6/6/2023	Garcia, Andy	Evidence management, creating 31 COCs.	1.7
6/6/2023	Conorton, Laura	Preparing affidavit's for Moldco Holdings, Plastics and Injection Tech	0.9

Date	Name	Narrative	Hours
6/6/2023	Pandit, Arpana	Preparing Retention letter for 4 employees; continue working on WEPP calculation.	4.6
6/6/2023	Messina, Stephen	On site at client location in Kitchener. Reviewed and compiled information to be included in the data room, summarizing leasing information, financial data, employee information ultimately preparing these documents to be sale-ready. Communicated with prospective buyers. Providing, collecting and organizing all communication material associated with the buying process.	7.8
6/6/2023	Damiani, Stefano	Onsite attendance at Kitchener; call with T. Hogan (Harrison Pensa); calls and emails with prospective bidders; Landlord letters, emails with counsel on same; conference call with TD and counsel; correspondence with SR&ED tax consultant; employee matters; WEPPA; customer negotiations; call with J. Yantzi re continuing supply agreements, emails on same.	8.2
6/6/2023	Sleeth, Jorden	Onsite attendance; tour with Onward (Witzel), review VDR contents, cash flow meeting with S. Messina; production meeting with onsite team; update and planning meetings with W. Van Alphen and S. Damiani; prepare for and attend update call with TD and counsel; meetings with onsite staff; consider KERP (need, quantum).	10.4
6/6/2023	Cestnick, Winston	On site attendance in Kitchener - production meeting, coordinating supplier pick up, orchestrating inventory counts, signing off on shipments, scheduling and calling staff for production and counts, answering creditor/buyer questions, updates to excel production schedule.	10.2
6/6/2023	van Alphen, Wendy	Meetings: Raymond; Production meeting; Corporate Assets Tour; Deloitte update Masco meeting; Windsor Moldules meeting; Tooling call meeting with Winston; Team meeting with Stefano; Call with legal counsel re requirement for continuing sales contract; Data room info meeting with Stefano and Stephen; Rollstamp call; Various customer calls: Knape & Vogt; Autosystems; Sun-Mar; Masco; Solinist; IIMED; Skyjack; Various calls & enquiries re sales process; Cavalier Tool; Danilee Capital; Direction to team re: inventory counts and tool organization; Call to supplier of Rollstamp Fixture - Reid Technologies; Direction to MGT: no release of anything to Sequel.	12.5
6/7/2023	Brown, Rose	Discuss banking with SD. Send email to TD Bank to obtain bank balances.	0.1
6/7/2023	Pandit, Arpana	Attending calls for WEPP worksheet finalization and employees to be retained; preparing retention letters and updating the control sheet; registering employees on WEPPA website.	7.5

Date	Name	Narrative	Hours
6/7/2023	Garcia, Andy	Printing 31 COC's, organizing evidence stickers to 31 COC's and creating project folder in lab room. Creating loadfile to load 31 evidence into Relativity Evidence Management.	1.4
6/7/2023	Messina, Stephen	On site at client location in Kitchener. Analyzed accounts receivable data and updated internal cashflow model. Launched the data room, adding finishing detail to ensure all prospective buyers were included.	7.8
6/7/2023	Damiani, Stefano	Onsite attendance at Kitchener; production meeting; call with J. Thrasher (NFP) to binding insurance coverage re June 8th expiry; correspondence with prospective bidders; instructions re data room launch and site visits; supplier notifications; finalize and issue letters to landlords; disbursements process; tooling requests; production staffing matters.	8.4
6/7/2023	Sleeth, Jordan	Cash flow review; exchange with Clek CEO re: settlement agreement, tool removal, review EoArm details; call with W. Van Alphen re: production, settlements, resin purchases.	1.5
6/7/2023	Cestnick, Winston	On site attendance in Kitchener - lead production meeting, coordinating supplier pick up, orchestrating inventory counts, signing off on shipments, scheduling and calling staff for production and counts, answering creditor/buyer questions, excel production schedule updates.	9.8
6/7/2023	van Alphen, Wendy	Meetings: Raymond; Production meeting; Corporate Assets Tour; Deloitte update Masco meeting; Windsor Modules meeting; Tooling call meeting with Winston; Team meeting with Stefano; Call with legal counsel re requirement for continuing sales contract - Airds; Data room info meeting with Stefano and Stephen; Rollstamp call; Various customer calls: Knap & Vogt; Autosystems; Sun-Mar; Masco; Solinist; IIMED; Skyjack; Rollstamp; Raymond; Set up request for payments - TD bank; Aarkel Visit and questions 10:00 to 12:00; Team update call.	12.5
6/8/2023	Garcia, Andy	Modifying loadfile and QAing results in Relativity Evidence Management. Creating O365 search of 22 custodians for unsearchable index in mailbox.	1.2
6/8/2023	Brown, Rose	(MPI)Contact TD Bank To confirm wire received and credit the CDN\$ Account.	0.3
6/8/2023	Messina, Stephen	On site at client location in Kitchener. Analyzed internal financial information for data room to ensure it aligns with audited information. Discussed our AR reporting capabilities with Controller. Cash flow and budget modelling.	8.5
6/8/2023	Casey, Brian	QA check on images and documentation.	0.5

Date	Name	Narrative	Hours
6/8/2023	Damiani, Stefano	Amend and execute settlement agreement with Armodilo, instructions to team; conference call with buyer group, respond to inquiries; review and sign letters to CRA; email correspondence with prospective bidders; production meeting; employee letter; various emails; conference calls.	4.3
6/8/2023	Pandit, Arpana	Preparing asset release forms for each employee and emailing HR instructions for releasing property; draft letters to CRA for opening new RT/RP accounts; completing WEPP forms and finalization of WEPPA worksheet.	8.8
6/8/2023	Cestnick, Winston	On site attendance in Kitchener - opening at 7am - meeting with customers, overseeing production and shipping, coordinating production schedule, calling and scheduling employees, calls with prospective buyers, inventory checks and counts.	10.7
6/8/2023	van Alphen, Wendy	Attend in Kitchener; daily Meetings: Raymond; Production meeting; Windsor Moldules meeting; Rollstamp; Raymond; resin requirements; Various discussions with customers; Assist and direct Winston regarding production requirements; plant organization.	12.7
6/9/2023	Garcia, Andy	Organizing Photos and uploading to Teams/TC/WC/NAS. Exporting Unsearchable PSTs and preserving all PST data. Cleaning up Evidence workspace.	1.8
6/9/2023	Messina, Stephen	On site at client location in Kitchener. Site visit with prospective buyer. Compiled further information to be provided to prospective buyers (customer data, forecasts and leasing information). Followed up with buyers who have yet to access the data room to ensure that they have the access.	5.5
6/9/2023	Casey, Brian	QA check on images and documentation.	0.5
6/9/2023	Damiani, Stefano	Onsite attendance at Kitchener; site tour with prospective bidder; data room; production meeting, approve material purchases, instructions to plant supervisor; amend customer letter; correspondence with counsel; WEPPA employee meetings.	8.2
6/9/2023	Brown, Rose	Trust Banking Adm - Input incomin wire received into Ascend - scan/save on Q and file hardcopy.	0.3
6/9/2023	Pandit, Arpana	Populate WEPPA forms for Kitchener employees.	7.2
6/9/2023	Sleeth, Jorden	Review Clek proposals; review tool removal incident in Windsor.	0.5
6/9/2023	Cestnick, Winston	On site at Kitchener location - leading production meeting, coordinating supply of resin, orchestrating and signing off on customer mold releases, coordinating employee scheduling, responding to customer queries and collecting funds.	9.7

Date	Name	Narrative	Hours
6/9/2023	van Alphen, Wendy	Daily Meetings: Raymond; Production meeting; Windsor Moldules meeting; Rollstamp; Raymond; resin requirements; Pangeo Tour; Assist Stephen with CF and internal FS of IT to balance to external FS; Sun-Mar call; Reid Technologies call; Various calls re Sequel - FFR Tool.	14.3
6/10/2023	van Alphen, Wendy	Attendance on site; review and document molds and resin delivery to IT; Update CF for report for Deloitte to TD; Various emails responses to customers.	5.5
6/10/2023	Damiani, Stefano	Call with counsel; email to tooling subcontractor; review and amend form of settlement agreement; emails.	3.2
6/11/2023	Damiani, Stefano	Emails re prospective bidders; draft agreement and email to counsel.	1.6
6/12/2023	Garcia, Andy	Exporting and preserving the results for documents/emails that hit on the keyword "Knoch". QAing results. Copying data to Staging and processing in Relativity.	1.1
6/12/2023	Casey, Brian	QA check on images and documentation.	0.5
6/12/2023	Pandit, Arpana	Filing WEPP forms for employees and registering employees on WEPP website.	5.5
6/12/2023	Damiani, Stefano	Onsite attendance at Kitchener; telephone and email correspondence with prospective bidders; production meeting; conference call with RJ Clapp of Sequel Tool; review Clek agreement, comments on same; meeting with D. Humphries (COO) and W. Van Alphen re customer tool builds; meeting with J. Sleeth; emails with M. Bottero (Kitchener Plant Landlord); correspondence with BMO service provider re site inspection; calls.	9.2
6/12/2023	Pardinas, Elijah		1.0
6/12/2023	Messina, Stephen	On site at Kitchener client location. Prepared and uploaded internal financial information to the data room. Liaised with potential purchasers on questions and coordinated site visits. Discussions with operational staff to obtain further information on equipment, for the benefit of potential purchasers.	8.1
6/12/2023	Sathiyar, E	Revisions to SISP materials.	-
6/12/2023	Sleeth, Jordan	Onsite attendance - update meeting with S. Damiani and W. Van Alphen; discussions with J. Deutchlander re: end of arm tools, bases, realization strategies; Clek settlement - circulate RM weights to Clek and confirm weights with Clek attendee, review sublease, calls with CBRE and Colliers re: market rates for leased warehouse space, email memo to A&B re: same; receive update re: FFR tool and approach with employee that released same; various onsite team meetings.	9.4

Date	Name	Narrative	Hours
6/12/2023	Cestnick, Winston	On site attendance at Kitchener location - opened plant at 7am and closed at 11pm. Ran production meeting; met with customers to facilitate release of tools, calls with customers to negotiate continued production or release, hiring of employees, coordinating shipments.	9.9
6/12/2023	O'Neill, Sandi	Attend at Plant 2 for opening, return to Plant 1; Approve 2 drop offs and one shipment going out - send pics to Laura; Review emails from the weekend; Approve shipment going out; Meeting with Wendy to go over payables and catch up from Thursday and Friday; Approve shipment going out - 2; TCT Kristina at Livingston - discuss last email and truck siting at boarder with material; for Kitchener; TCT Zena at Livingston IT's rep - LM regarding paying on terms and releasing trucks; at the boarder; TCT Kristina at Livingston, arrange payment to release shipments, print up receipt and confirmation; Email Chase re invoice at what to apply payment to; Read email from Stephen Messina re Superior Propane - TCT Stephen to advise not to pay; any pre receivership invoices; Approve shipment going out; Meeting with Wendy and purchasing group re process of Pos - Duane, Lois, Rob Kolody, Mike Foulon; TCT Davino Davis at Cascades LM re continuing service; Meeting with afternoon staff, John Robert and Dave Mastronardi - went over process again; of shipments coming in and going out - advise that Mike Allen is no longer working with us; Approve shipment going out; TCT Zena again at Livingston IT's rep - LM regarding paying on terms and releasing trucks; Go over PO's and payments coming out this week; Scan and email Ineos PO and request invoice for payment and shipping; Review production AR for Laura to send out - review with Wendy	12.0
6/12/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; Mayco production touch point; Various emails and calls with customers; tooling customers; requests for resin; suppliers; Review of AR.	12.0
6/13/2023	Brown, Rose	Scan and send mail rec'd to SD, Banking Admin - Update Contact Worker with banking information for Trust Accounts requests. Send SD Online banking reports and Ascend GL's.	0.5
6/13/2023	Garcia, Andy	Validating PSTs, running keyword searches in EnCase, reviewing responsive documents from keyword search. Creating file list and validating results.	0.9
6/13/2023	Pandit, Arpana	Filing WEPP forms for employees and registering employees on WEPP website.	6.0

Date	Name	Narrative	Hours
6/13/2023	Damiani, Stefano	Onsite attendance at Kitchener; instructions re Moldco A/R collections; meeting with Controller (C. Dobre), instructions on reporting; production meeting; calls with customers re settlement negotiations; data room instructions; correspondence with W. Rueger (CRA Insolvency Unit); employee matters and WEPPA instructions; emails with counsel; various calls and emails re operations and sales process.	9.2
6/13/2023	Messina, Stephen	On site at Kitchener client location. Continued to revamp cash flow forecast to better represent the financial position of the company, post receivership. Assessed cashflow position of the company by analyzing AR, invoices and receipts. Continued to provide clients with responses to their questions and schedule site visits for Kitchener and Windsor locations.	7.9
6/13/2023	Sleeth, Jordan	Call with J. Yantzi re: Clek settlement and sublease assignment, call with Clek CEO re: same, update memo to A&B, pursue end of arm tools valuations and ownership.	3.5
6/13/2023	Cestnick, Winston	On site at Kitchener location - met with employees for production meeting at 9am, coordinated shipments, scheduled production, signed off on shipment releases, calls with customers including solinst and miller knoll, calls with customers re. releases.	9.7
6/13/2023	O'Neill, Sandi	Attend at Plant 2 for opening, return to Plant 1 for opening; review emails; circulate court order to the Delivery Guys with instructions to continue services; Approve shipment going out; review AR for production with Laura; Email Pam for yearly totals for Enbridge gas; Discuss try out AR's with Lou-Ann and approve release; WEPP training for staff preparation; Approve shipment going out-2; Print up Linde bills - discuss with Adam - need to call Linde regarding 2 of the bills; Review and approve 3 wire transfers; Email the Delivery Guy quoting section 12 of the receivership court order; TCF Zena at Livingston - discussion on working with us on net terms - send email to her; to forward to credit department; Approve shipment going out; Send email to Collection Service of Windsor with court order; Respond to email from the Delivery Guy; Call Linde to discuss two of the bills - unable to answer - will have to wait for manager; to return from vacation next week; Review another batch of try out AR for Lou-Ann to send out; Approve shipment going out; TCT LSI - spoke to Mike Atkinson - discussed receivership - emailed court order	11.3

Date	Name	Narrative	Hours
6/13/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; Mayco production touch point; Review of Windsor & kitchener payroll and prepare request for transfer of funds; Various emails and calls with customers; tooling customers; requests for resin; suppliers; Review of AR; Pangeo customer Visit; Minth Group tour.	12.2
6/14/2023	Brown, Rose	Trust Banking Administration - Disbursement discuss with contact worker.	0.2
6/14/2023	Casey, Brian	QA check on images and documentation.	0.5
6/14/2023	Pandit, Arpana	Filing WEPP forms for employees and registering employees on WEPP website.	5.0
6/14/2023	Damiani, Stefano	Onsite attendance at Kitchener; correspondence with prospective bidders; meetings re data room; customer emails, instructions to W. Cestnick; meeting with tooling manager; call with BMO Inspector, emails with T. Hogan (Harrison Pensa) on same; employee letters; conference call with Aird & Berlis re supply agreement; production matters.	9.3
6/14/2023	Messina, Stephen	On site at Kitchener client. Pulled all sales data over last 5 years for Injection Tech and Moldco, summarizing and redacting key information, and uploading to the data room. Obtained and summarized historical utilities data to upload to the data room. Performed a site visit with potential purchasers at the Kitchener site. Responded to buyer questions and organized other site visits.	8.2
6/14/2023	Sathiyar, E	Revisions to SISP materials.	-
6/14/2023	Sleeth, Jordan	Onsite attendance - SISP meeting with Feacomm and King Mold, call with counsel to Aarkel; production and cash flow status call with W. Van Alphen, D. Damiani and team; customer credit notes follow ups; call with K. Plunkett and M. Lici of A&B re: KW sublease assignment; FFR tool status call with D. Humphries and W. Van Alphen; Moldco plant tour and production staff discussions; call with Clek CEO re: sublease and settlement, circulate same.	8.8
6/14/2023	Cestnick, Winston	On site at Kitchener location - opened plant at 7am and closed at 11pm; ran 9am production meeting, calls with customers (Raymond, Broda, Geosmart, MAKS, KV), coordinating shipments, production scheduling, employee scheduling, creating tool release track.	9.1

Date	Name	Narrative	Hours
6/14/2023	O'Neill, Sandi	Open Plant 2 and Plant 1; Review correspondence re shipments and approve release; Discussion with Flex-N-Gate rep in the plant regarding process of resin acknowledgment; Talk to Rob Kolody re LSI- review process again for ordering supplies; Talk to Debra re WEPP and prepare boardroom - waiting for Arpana; Meet with Arpana-Windsor office and Debra-WEPP training; Print cover letters for Arpana - WEPP; Approve shipment going out; Meeting with Mike Poulon, Marty and Wendy and Duane regarding FFR and Sequal Tool; call from FFR looking for tool; Receiver payments review with WVA; Assist Debra with printing form for Arpana - WEPP; Discuss errors on PoC's with Arpana re amounts and super priority; Approve shipment going out; Talk to John Robert re customers walking out the plant with parts - he needs to advise; customers of signing out process; Check in with Arpana and Debra re WEPP POC's sign ups; Approve shipment going out; Take pics of parts coming in for tryout-send to Laura; TCT Rose Brown re cheque req questions; Do up first Deloitte payable - scan and send to Stefano for approval and process; Email Stephen re MNSI invoices; Approve parts going out - Omega Tool; Review resin orders and go through emails with Wendy for approvals and pick ups; TCT Stu at KoneKranes re inspections due on cranes - email court order and instructions; Email back customers for Wendy re approval to pick up resin	12.3
6/14/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; King Mold visit and tour; Mega Mold visit and tour; Review of IIMED quote.	12.3
6/15/2023	Brown, Rose	Scanning and send mail rec'd to SD.	0.3
6/15/2023	Casey, Brian	QA check on images and documentation.	0.5
6/15/2023	Pandit, Arpana	Filing WEPP forms for employees and registering employees on WEPP website.	6.5
6/15/2023	Damiani, Stefano	Correspondence with prospective bidders; review sales materials; review customer and supplier information; call with counsel; various emails; call with toolmaker re tools in China; production matters; review A/R; review Tryouts indemnity.	6.9
6/15/2023	Messina, Stephen	On site at Kitchener client location. Obtained production forecast and began redacting information / adding contribution margins to add to the data room, per buyer requests. Provided buyers with a potential exit strategy/consolidation plan. Tour site with potential purchasers at the Kitchener site. Address buyer questions and organized other site visits.	7.9

Date	Name	Narrative	Hours
6/15/2023	Sleeth, Jordan	Onsite attendance - tour with Maynards; KERP discussions with J. Deutchlander; FFR tool issue - review POs and related documents, call with (and memo to) T. Hogan, SD and WVA re: same; SISP - review and comment on sale process timeline document, discuss same with S. Messina; review Clek amendments to SA, circulate to J. Yantzi.	5.6
6/15/2023	Cestnick, Winston	On site at Kitchener location - ran 9am production meeting w/ employees, calls with customers negotiating payment and release (Broda, Bossard, Sunmar, Rhino Modular), coordinating and signing off on shipments, calls with china supplier overseas.	10.1
6/15/2023	O'Neill, Sandi	Open Plants 1 and 2; Approve shipment going out; Meet with Arpana and assist with WEPP forms with rest of employees; Work on payables - complete 12 cheque reqs; Email Mike at RMS to have agreement signed; TCF Mike at RMS -discussed process; Approve shipment going out; Text from Lois re Cascades - will reach out again to Mr. Davis; Approve shipment going out; Check in Arpana and Debra re WEPP applications; Walk Arpana through plant; Approve shipment going out; TCF Cascades - advised willing to continue to work with IT - getting POs approved; Approve shipment going out; Meet with Wendy -catch up from the day - go over payments for tomorrow; Approve shipment going out.	12.0
6/15/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; SR China - tooling call; Resin review meeting; discussion on resins and other components to be purchased.	6.2
6/16/2023	Damiani, Stefano	Onsite attendance at Kitchener; call with J. Thrasher of NFP (Insurance Broker) re renewal due June 30, 2023; call with T. Hogan (Harrison Pensa); draft demand letter re A/R; production meeting; instructions to Controller; conference call with Customer re Tool; production Tryouts agreement; planning call; amend sales materials; emails with Aird & Berlis; draft customer settlement agreement re A/R, inventory, components, and tools; cash management; approve disbursements; Magna shipments; respond to inquiries.	9.4
6/16/2023	Messina, Stephen	On site at Kitchener client site. Developed newspaper advertisement and called several industry publications to determine availability. Followed up with all prospective buyers who were inactive in the data room / did not return NDA etc. Site tour and respond to purchaser queries.	8.0
6/16/2023	Sleeth, Jordan	Onsite attendance - draft update memo to TD and A&B; FFR tooling issue - update call with T. Hogan, call with FFR to provide tool status update; SISP - calls with MNE Auctioneers; status update call with S. Damiani and W. Van Alphen; update call with A. Pandit.	5.3

Date	Name	Narrative	Hours
6/16/2023	Cestnick, Winston	On site at Kitchener location - opened plant at 7am and closed at 11pm, ran 9am production meeting, produced tooling and goods release schedule, drafted creditor update email, met with employees regarding KERP, calls with suppliers and contract negotiation.	8.3
6/16/2023	Pandit, Arpana	Preparing Retention Letter and update email for TD bank	0.5
6/16/2023	O'Neill, Sandi	Oopen Plant 2 and 1; attend to deliveries take pics and send to Laura; Scan 12 payables to USB - rename and send to Stefano for approval; Approve shipments going out; Conversation with Lois and Mike re emails and PO's for Advanced Composites; Meet with Donny and Josh from Danbury for walk around; Review email from Stefano for WSIB anf EHT info - talk to Pam - call EHT for info; 2022 final return nevery rec'd from EHT - Pam emailed today - discussion with; EHT and open new account - notice sent, etc.; Call with Stefano re cheq reqs, EHT and WSIB; Meeting with Danbury - show offices at Plant 1 and take them to Plant 2; Travel back to Plant 1; Go through emails - send Stefano scanned cheq reqs; Review production A/R for Laura; Ask Lou Ann to make signs for Plant 2 - no entry into building; Meeting with Dan Demars re Rollstamp truck coming Sunday to pick up parts; Meeting with Lois re truck coming Saturday from Kitchener - provided list of staff; working so I can advise security guards on the weekend; Total up invoices for Wendy to advise bank - CND and USD; Go meet with security guards and provide them with list for the weekend	10.0
6/16/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Rollstamp discussion; Sequel update call; Masco meeting; Resin review meeting; discussion on resins and other components to be purchased; Cashflow review.	11.8
Total			710.5



Invoice 8003807398

Deloitte Restructuring Inc.

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: July 26, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc., Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the receivership order dated May 26, 2023 for the period June 17, 2023 to June 30, 2023.

Please see attached appendices.

HST applicable 252,110.00

Expense

Out-of-pocket Expenses:

- Mileage 1,767.42
- Accommodations - Hotel 3,470.56
- Parking 60.13
- Taxi/Rideshare 188.19
- Miscellaneous 81.52

HST applicable 5,567.82

Sales Tax

HST at 13.00 % 33,498.12

Total Amount Due (CAD) 291,175.94

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.



Invoice Number 8003807398

July 26, 2023

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8003807398	291,175.94	Payment for invoice 8003807398

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	47.0	725.00	34,075.00
Damiani, Stefano	Director	80.9	605.00	48,944.50
van Alphen, Wendy	Senior Manager - Contractor	96.0	525.00	50,400.00
Khemani, Bharat	Manager - Trust Accounting	61.6	475.00	29,260.00
Brown, Rose	Manager - Trust Accounting	11.5	350.00	4,025.00
O'Neill, Sandi	Manager - Consultant	97.2	350.00	34,020.00
Messina, Stephen	Senior	82.4	295.00	24,308.00
Pandit, Arpana	Senior	4.5	295.00	1,327.50
Cestnick, Winston	Analyst	93.1	250.00	23,275.00
Conorton, Laura	Analyst	9.9	250.00	2,475.00
Total Professional Hours and Fees		584.1		252,110.00
Out-of-pocket Expenses				5,567.82
Mileage			1,767.42	
Accommodations - Hotel			3,470.56	
Parking			60.13	
Taxi/Rideshare			188.19	
Miscellaneous			81.52	
Total Fees and Expenses (CAD)				257,677.82



Appendix #2

Work performed from June 17, 2023 to June 30, 2023

Date	Name	Narrative	Hours
6/17/2023	Sleeth, Jorden	Revise draft TD update memo.	1.0
6/18/2023	Sleeth, Jorden	Finalize update memo for TD and counsel, circulate same.	0.5
6/18/2023	Damiani, Stefano	Review customer agreements; compile financial information re data room; various emails; planning.	3.7
6/18/2023	van Alphen, Wendy	Update CF for report for Deloitte to TD; Various emails responses to customers	3.0
6/19/2023	Sleeth, Jorden	FFR tool call; finalize Clek settlement documents (call with K. Plunkett re: same), review and circulate BoLs for FG shipments; forklift incident; cash flow call with B. Khemani and W. Van Alphen; team call; review BMO leased tool issues in SISP.	5.3
6/19/2023	Damiani, Stefano	Correspondence with prospective bidders; discussion with T. Hogan (Harrison Pensa) re Sequel, emails on same; conference call re disbursements and cash flows; instructions to S. Messina re sales process; site tour and email correspondence with prospective bidders; review and compile information re data room, instructions to S. Messina; call w Plant Supervisor; production meeting; draft response to customer re proposal (Sun-Mar); Kitchener payroll; BMO lease matter; emails with J. Thrasher (NFP) re insurance renewal.	6,8
6/19/2023	Messina, Stephen	On site in Kitchener location. Conducted site visits for 3 interested parties at the facility; update VDR, updates to S. Damiani.	7.6
6/19/2023	Khemani, Bharat	On site at Kitchener plant - Building cashflow reporting process (on daily basis) to capture each bank transaction (across multiple bank accounts) in a correct GL and with minimum manual intervention. Reviewing each transaction for last 3 weeks.	5.2
6/19/2023	Cestnick, Winston	On site at Kitchener location - opening and closing plant, running production meeting, calls with forklift suppliers to replace broken one, drafting customer release documents, customer tool tours, production scheduling.	9.6
6/19/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; KB Components visit & tour; Various emails and calls with customers; tooling customers; requests for resin; suppliers; FFR - ITI update call; Review of AR; ITI cashflow call with JS and BK	12.5

Date	Name	Narrative	Hours
6/19/2023	O'Neill, Sandi	Open Plant 2 - hang signs outside re unauthorized; personnel; Review emails from last night; Approve shipments going out - 10; Meeting with Wendy re priorities; Print up cheque reqs from Stephen - respond to email; TCT John re packing slip from weekend drop off of tool; TCT Alift for forklift inspections - set up appt for Wednesday am - email Rob Kolody; Review bills to pay with Pam; TCT to WSIB for receivership information; Text from security guard re incident report on the weekend - called police for homeless guy at plant 2; Approve EFTs and wires for Pam to send out; TCT to CRA with Wendy to Richard Moon-Wan and Wendy Ruger re: opening new accounts - LM with Richard and spoke to Wendy re what we need for receivership she emailed Richard to contact us; TCT Laarni at CRA -LM re payroll trust account audit; Email Stefano answers to questions re WSIB and EHT - new accounts, etc.; TCF Richard Moon-Wan from CRA - discussion re setting up new accounts; Meeting with Jordan, Stefano, Wendy re cashflow; Review Windsor and Kitchener's payroll - call Debra with changes - review; and approve to send; Scan and email Rose all cheque reqs to pay	10.2
6/20/2023	Conorton, Laura	Preparing wires to Chase Plastics and Rogers for Inject tech, correspondence on wire details.	1.0
6/20/2023	Brown, Rose	Trust Banking Adm - Review Disbursement cheque requests and print documentation. Discuss with SO regarding date requirement. Pull Online banking report and send to SO to obtain receipt voucher for incoming wire/Transfers.	0.7
6/20/2023	Sleeth, Jordan	Prepare for and host update call with TD and counsel; email exchanges with Clek re: deliveries and settlement agreement; instructions to T. Hogan re: FFR tool recovery; calls with W. Cestnick re: Clek deliveries.	2.8
6/20/2023	Damiani, Stefano	Onsite attendance at Kitchener; customer settlement negotiations; correspondence re toolmaker; conference call with TD and counsel; telephone and email correspondence with J. Thrasher (NFP) re insurance, internal reporting on same.	7.8
6/20/2023	Messina, Stephen	Obtained and uploaded information to the data room related to Utilities and historical Rent amounts payable. Began compiling lists of client questions to develop central FAQ resource for all buyers to access.	7.8
6/20/2023	Khemani, Bharat	On site at Kitchener plant - Implementing a live cashflow reporting model to capture the real-time inflows and outflows in the various operational and financing categories. Working alongside Finance Controller to make it daily reporting protocol.	7.5

Date	Name	Narrative	Hours
6/20/2023	Cestnick, Winston	On site at Kitchener locaiton - internal calls re. insurance, coordinating machine repairs, coordinating repairs of damaged building, drafting customer release documents, coordinating the identification and staging of tools for CLEK, phone calls with suppliers.	10.1
6/20/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; Mayco production touch point; Review of Windsor payroll and prepare request for transfer of funds; Various emails and calls with customers; tooling customers; requests for resin; suppliers ITI CF call with BK and SD; Review of AR Pangeo customer Visit; Minth Group tour	12.5
6/20/2023	O'Neill, Sandi	Open Plant 2; Review emails from last night Approve shipments going out - 10; Review tryout A/Rs for Laura to send out; Review payables for Deloitte - organize by dates to pay; Review and approve A/R for production for Lou-Ann TCF and email from Rose re payables-gather info for her for wires-transit #'s and physical addresses; TCF Stefano and Steven re meeting at 2:30 to discuss utilities and rent - get Enova online access from Pam - look up and save statements from May 2022 to may 2023 and send to them; Review and respond to Richard from CRA re contact info and online access info; Go over process for PO's with Wendy and Lois Meeting with Wendy and Duane - disc problems from last night trucks coming and going out - review process with team and reports required from staff; Preparation of cheque requisitions for Receiver payables	10.5
6/21/2023	Brown, Rose	Trust Banking - Pull online report and sent to onsite staff. Input disbursement requests and send out.	0.8
6/21/2023	Sleeth, Jorden	Onsite attendance - attend to insurance renewal call with NFP; update with FFR re: tool status; Clek production and delivery issues (confirm payment); Finalize JD KERP; various status update meetings with team re: cash flow, production, SISP and responses to bidders; call with M. Lafortune; insurance renewal analysis and liaise/call with R. English re: same; review customer letters; circulate customer release.	8.3
6/21/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference call and emails with J. Thrasher (NFP Insurance) re June 30 renewal negotiations; call with customer, review tool maker release and provide comments; emails with counsel; production meeting; instructions to Engineering Manager re bases and CAD quotes; meeting with Kitchener Landlord (M. Bottero of Rosewater); call with A. Colucci (FCA) re insurance; review and amend production agreement.	9.6
6/21/2023	Messina, Stephen	On site at Kitchener location. Communicated the finalized sales process timeline to all prospective bidders. Continued to field questions from bidders and provide supporting information and responses.	8.2

Date	Name	Narrative	Hours
6/21/2023	Messina, Stephen	Held several calls with the insurance company regarding the renewal of our policies. Obtained on-site information to support our insurance renewal.	2.0
6/21/2023	Khemani, Bharat	On site at Kitchener plant - Reviewing the actual cashflow reports for last 3 weeks since receivership date and modeling a forward looking 13-week cash requirement forecast to ensure availability of cash for next 3 weeks priority operational payments.	8.6
6/21/2023	Cestnick, Winston	On site at Kitchener location - opening and closing location, discussions with employees, preparing for and running production planning meeting, developing production schedule, projecting resin purchases, sit down for internal cash flow development.	9.4
6/21/2023	Pandit, Arpana	Attending to transition of HR from Kitchener to Windsor and labelling all the cabinets and folders.	2.0
6/21/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; Walkthrough production & CR workbook; TGSX cost review; Call to broker re insurance	11.5
6/21/2023	O'Neill, Sandi	Open Plant 2; Review emails from last night - Approve shipments going out - 10; TCT to Enbridge re bill for Ambassador Drive - attend to deposit waiver - See Pam for actual Livingston Bill to send with reimbursement - TCT Enwin - LM re charges on the bill - TCF Kone Kranes - willing to provide quote for semi annual inspections and set up schedule for first of July to have inspections done - Do up 3 payables and 1 deposit req - scan and send for approval - Received approval - send to RS for payment Work on Deposit req forms	8.5
6/22/2023	Conorton, Laura	Processing wire to Reid Tech, reviewing documents for wire to Van Alphen and Associates, correspondence with team, online banking, inputting receipt of funds.	1.5
6/22/2023	Brown, Rose	Trust Banking Administration - Deposits/Disbursements. Pull online report and send to BK.	1.0
6/22/2023	Sleeth, Jordan	Onsite attendance - Insurance renewal calls with broker, TD, updates to TD re: extension of coverage; tour facility; FFR tool release - review and execute release; liaise with D. Humphries and counsel re: tool condition and release protocol, call with FFR re: tool repair arrangements; cash flow meetings with B. Khemani; calls/meetings with team re: production, payroll; SISP - review APA and provide comments, review and consider purchaser requests and VDR uploads.	6.8

Date	Name	Narrative	Hours
6/22/2023	Damiani, Stefano	Onsite attendance at Kitchener; review amended mutual release re tool, emails with counsel; conference call and emails with J. Thrasher (NFP) re insurance renewal; emails with equipment lessor re forklift; production meeting; correspondence with W. Van Alphen re Windsor and Kitchener production and customer settlements; instructions to Controller; compile and review data room information and SISP process, instructions to S. Messina; emails with M. Bottero (Rosewater) re 41 Ardelt, cranes, construction; customer negotiations; instructions to Engineering Manager; cash flow; resin count matters.	9.1
6/22/2023	Messina, Stephen	On site at Kitchener location. Compiled detailed current and historical employee data to provide to the data room. Obtained and uploaded the IT try-out billing rates to the data room. Uploaded insurance documentation to the data room.	7.4
6/22/2023	Khemani, Bharat	On site at Kitchener plant - Working alongside team members to implement a process to correctly forecast the weekly cash outflow for Resin procurement. Designing a cashflow model for capturing the sufficiency of funds available for Resin procurement.	5.2
6/22/2023	Cestnick, Winston	On site at Kitchener location - running production meeting, calls with logistics companies coordinating shipments and outstanding payments, negotiating final finished goods purchases with customers Solinst, Broda, Miller Knoll, Romet, internal calls.	9.9
6/22/2023	Pandit, Arpana	Preparing retention letter and updating the list of employees retained.	2.5
6/22/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Various customer calls; Raymond executive call, update and review; prep of email to Raymond regarding shipping and manufacturing schedule; Infinity asset tour; TD Insurance call; Resin review meeting; discussion on resins and other components to be purchased	9.7
6/22/2023	O'Neill, Sandi	Open Plant 2; Review emails from last night; Approve shipments going out - 13; Prepare Deloitte payables -scan and send; Finish deposit reqs for Rose Brown - 4 - send to Stefano for approval; Ineos delivery of 13 gaylords - call Steve Burns - redirect to Plant 2 for drop off; Print up invoices - review - submit for approval; TCT Linde for follow-up on 2 invoices - spoke to Lori - will forward to Manager again; TCF Wayne - PC Outfitters - discussion on setting up times for him to come and work on list of computers; Email and TCT Coxon re outstanding invoices; Email and TCT with UniqueFab about continuing work with us; Email court order of receivership to Dor-co, Wittman group and SpeedyCom; Mark payables paid after email confirmation and file away; Review and respond to email from LSI re continuing services	9.8

Date	Name	Narrative	Hours
6/23/2023	Sleeth, Jordan	Onsite attendance - attend to FFR tool release, call with V. Giniotis re: same; SISP - VDR review, call with Maynards, plan for Windsor attendance with purchaser; cash flow budget review; facility tour.	3.5
6/23/2023	Brown, Rose	Trust Banking Adm - Update Ascend various receipts. Pull online banking report and prepare Ascend report and send out. Process two wires disbursements, have signed & sent to TD Bank.	2.3
6/23/2023	Damiani, Stefano	Onsite attendance at Kitchener; production meeting; review proposal re Raymond; cash flow; sales process FAQ; call with prospective buyer; data room instructions; amend APA, call with J. Yantzi (Aird Berlis) on same; customer settlement; emails.	7.3
6/23/2023	Messina, Stephen	On site at Kitchener location. Held discussions with a prospective bidder and provided detailed responses to bidder questions in the form of an FAQ. Started the first draft of the Bid Allotment.	7.7
6/23/2023	Khemani, Bharat	On site at Kitchener plant - Working alongside Finance Controller to implement pre-receivership Accounts Receivable (AR) reporting process on daily basis in-order to accelerate the settlement timelines.	6.3
6/23/2023	Cestnick, Winston	On site at Kitchener location - running production planning meeting, dealing with forklift supplier on site, calling suppliers and purchasing items for machine repairs, coordinating movement of trailers for landlord demolition, approving outbound shipment.	7.8
6/23/2023	van Alphen, Wendy	Daily production meeting Daily customer meetings: Raymond; Sun-Mar; Reid; Rollstamp discussion; prep of RM request from J Walton; Sequel update call & payment & receiving of tool; Masco meeting; Danilee Capital call ;Prep call for Monday Aarkel visit; Resin review meeting; discussion on resins and other components to be purchased; Cashflow review	10.3
6/23/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out - 16 - Prepare Deloitte payables/deposit reqs - scan and send - 4 - TCF Rose on payables - Discussion with Steve Burns re email from Aarkel - needs resin now for - tryout - emailed acknowledgement and approval to let go - Review email from Pam to new broker - made changes - Email Rose re transfer; Respond to Bharat re inquiry on rent - forwarded to Pam to get breakdown - Received info from breakdown forwarded to Bharat - TCT/TCF Steve Doblton - Cavalier tool re releasing material - called back - again with Wendy - Wendy to call his boss Brian - Meeting with Duane re setting up schedule for Wayne from PC Outfitters to come - and work on computers - TCT Wayne Bedard PC Outfitters; Respond to email from Unique Fabricating -willing to accept orders from IT with - conditions - asked for list of material and costs - Discussions with Lou-Anne, Pam and Laura re cheque stubs, remittances, deposits - and things needed to do deposit requisitions for Rose	11.5

Date	Name	Narrative	Hours
6/26/2023	Conorton, Laura	Reviewing of invoices and requests, trust administration, correspondence with R. Brown. Processing wires to the Materials group.	1.5
6/26/2023	Messina, Stephen	On site at Windsor location. Conducted site visit with key buyer, providing various materials and information during in-person discussion. Drafted FAQ document for the data room. Began drafting the bid lot allotment package.	8.2
6/26/2023	Khemani, Bharat	ON site at Kitchener unit - Working on 13-weeks cashflow projections. Planning liquidation of pre-receivership AR outstanding along with liquidation timelines for finished goods as on receivership date.	7.1
6/26/2023	Sleeth, Jordan	Onsite in Windsor - facility tour; SISP meeting with Aarkel Tools; team meeting with D. Humphries and receiver team re: lease and landlord issues, staffing; calls with W. Cestnick re: Windsor product issues	6.0
6/26/2023	Damiani, Stefano	Onsite attendance at Windsor; site tour and meeting with prospective buyer team; call with S. Bakos (Landlord) re Windsor Warehouse; review amended APA; correspondence prospective bidders and counsel; equipment rental; production meeting; call and emails with R. Danter (Harrison Pensa) re equipment matters, security review; approve customer settlement document, instructions to W. Cestnick; data room; cash disbursements and cash flow.	9.8
6/26/2023	Cestnick, Winston	On site at Kitchener location - prepared priority list of discussion items and led production meeting, prepared releases for customer molds, calls with customers regarding process and final purchase negotiations, orchestrating resin counts, shipping.	10.1
6/26/2023	van Alphen, Wendy	Raymond daily update; Production meeting; resin review meeting; Meeting with Aarkel re due diligence; Approval of shipments; Discussions with Danilee Capital; Call with Bharat re cashflow	9.5
6/26/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out -14; Prepare Deloitte payables/deposit reqs - scan and send -7; TCF Rose re wires from Friday - disc on invoices needed for all sales deposits; TCF Sally Bakos (landlord at warehouse) re incident on Sunday with father - sent email for father to give 48 hours notice and the reason why he is at the plant; TCT to Enwin - follow up on message left re \$17,000 bill; Meet Wayne from PC Outfitters to image computers - set him up to start going through list of computers; Meet Jordan, Stefano, Stephen at Plant 1 in Windsor - down for a visit TCT to Entec-LM and emails with 4 people to get physical address for wire transfer; Review payroll for this week; Talk to Adam about his overtime	10.5
6/27/2023	Conorton, Laura	Processing wire for Materials Group, amended from yesterday's request. Processing wire for Entec and Livingston. Trust Administration, correspondence with TD bank, S. O'Neill.	1.0

Date	Name	Narrative	Hours
6/27/2023	Messina, Stephen	On site at Windsor location. Conducted a site tour with an interested party. Held discussions with other prospective buyers, answering questions and providing responses to questions regarding the sale of the company. Collected data for data room upload.	9.0
6/27/2023	Khemani, Bharat	On site at Kitchener unit - Working on 13 weeks cashflow projections. Building weekly Resin procurement schedule based on the current production schedule for both the units (Windsor and Kitchener).	7.5
6/27/2023	Sleeth, Jordan	Various - team call re: outstanding items; draft response to SISP participant; review VDR postings.	2.5
6/27/2023	Damiani, Stefano	Onsite attendance at Windsor; call with Whitney Realty re 4350 Industrial, and detailed email information request on same; meeting with prospective bidder; production meeting; call with forklift owner, expedite delivery; emails with NFP re insurance renewal; calls with logistics vendors; review and sign wires; telephone and email correspondence with the Windsor Plant Landlord; instructions to S. O'Neill; emails with the Kitchener Plant Landlord; instructions to team; emails with Baker McKenzie re customer.	9.4
6/27/2023	Cestnick, Winston	On site at Kitchener location - prepared priority list of discussion items and led production meeting, calls with customers regarding mold releases, calls with suppliers for repairs and input purchases, prepared excel analysis of resin usage and required.	9.3
6/27/2023	van Alphen, Wendy	Lucid meeting; Various calls to customers, potential buyers and emails	1.7
6/27/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out -12; Prepare Deloitte payables/deposit reqs - scan and send -8; TCT Uline re continuing service - updated account information - prepare order; TCT Bluewater Heater-LM- Joe called back - willing to continue service - sent email with court order and instructions to update billing info; TCT Wayne at PC Outfitters re Steve Burns' computer - took pictures for Wayne and restart computer for Steve; TCT Rogers re June's bill - explanation on lines not removed; Discussion with Rob Kolody regarding another supplier; TCT Kone Kranes - f/u on semi annual quote and schedule inspection - emailed me quote Print and review cheque reqs from Winston and Stephen to process; Deal with Livingston issue - truck held at border - talk to Stefano to approve emergency cheque req - have Pam get \$ amount - do up cheque req - get Stefano to approve- call Laura and advise its coming - scan and email; Discussion with Wayne from PC Outfitters-updated me on status of computers	11.5
6/28/2023	Conorton, Laura	Processing various payments via cheques and wires, trust administration, administration, couriers, reports for Inject Tech and Moldco. Correspondence with team members and TD bank.	2.8

Date	Name	Narrative	Hours
6/28/2023	Messina, Stephen	On site at Kitchener location. Hand delivered rent cheque to the home of Landlord. Continued work on bid allotment for the sale of assets / business. Answered emails related to prospective buyer questions. Updated deal tracker for site visits.	6.8
6/28/2023	Messina, Stephen	Collected and uploaded information for the data room.	1.0
6/28/2023	Khemani, Bharat	On site at Kitchener unit - Assisting independent valuer appointed by the potential buyer for a thorough walkthrough of machines and tools in Kitchener plant. Working on 13-week cashflow projections to capture the estimated outflows on account of payroll.	7.4
6/28/2023	Sleeth, Jordan	Onsite attendance - cash flow review meeting with B. Khemani; review 4350 Industrial Lease and discuss landlord approach and strategy with S. Damiani; status update meeting with receiver team.	4.0
6/28/2023	Damiani, Stefano	Onsite attendance at Kitchener; site tour with prospective bidder; production meeting; correspondence with prospective bidders, instructions to S. Messina re data room; instructions re customer settlement agreement; conference call with customer and its counsel; prepare customer settlement agreements, instructions on same; staff meeting; emails with counsel; emails with Landlord; emails with broker.	9.2
6/28/2023	Cestnick, Winston	On site at Kitchener location - prepared priority list of discussion items and led production meeting, oversaw resin counts, orchestrated shipping document preparation, prepared customer releases, discussion with employees on machine breakdowns and repair.	8.0
6/28/2023	van Alphen, Wendy	Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Reid; Resin review meeting; discussion on resins and other components to be purchased; Mayco production touch point; Review of Windsor payroll and prepare request for transfer of funds; Various emails and calls with customers; tooling customers; requests for resin; suppliers ITI CF call with BK and SD; Review of purchase orders and resin/supply quantities; Pangeo customer Visit; Minth Group tour	12.3

Date	Name	Narrative	Hours
6/28/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out -15; Prepare Deloitte payables/deposit reqs -10; Review A/R list for tryouts and production for Lou-Anne and Laura to send out; Review and respond to emails from customers re resin - send indemnity letter and instructions - Optimum, DMS,RMS, Green Circle; Email Richard Moon at CRA for update on new account numbers; Order copy paper and toner from staples from WVA for office; Meeting with Duane Humphries and Wendy re processes in plant, potential buyers, staff, etc.; Email Debra HR give Colin raise this week; Stamp payables confirmed paid by RS Trust - file away TCT Mr. Greco - landlord of Plant 2 - discuss showing up - set up meeting for next week; Email Sally (Greco's daughter) to advise; Discuss payables with Wendy - email MDM re payments and money on deposit; Go through Monts on Time invoices and PO's to pa;y Review A/R's for tryouts for Lou-Anne to send out	10.9
6/29/2023	Conorton, Laura	Processing wire for Livingston, receipt, trust administration, filing, documenting, Processing urgent wires.	2.1
6/29/2023	Messina, Stephen	On site at Kitchener location. Produced first cut of bid allotment schedule and reviewed by team. Collected HR data to be uploaded to the data room. Responded to buyer questions via email and phone. Uploaded FAQ document to the data room.	8.8
6/29/2023	Brown, Rose	Trust Banking Adm - Disbursement requests. Pull online banking report and update Ascend and prepare Excel report and send to Team.	1.2
6/29/2023	Khemani, Bharat	On site at Kitchener unit - Detailed review of cashflows generated post receivership along with vetting of next 13-weeks cashflow model. Analyzing key cash outflows for the next 4 weeks to help sustain the operations.	6.8
6/29/2023	Sleeth, Jorden	Onsite attendance - review customer settlements; consider 4350 Landlord and RE broker approach with S. Damiani; cash flow review meeting with team; SISP considerations (APA, VDR) meeting with team; email memo to ITI/MPI staff re: asset releases, safety pr	5.5
6/29/2023	Damiani, Stefano	Onsite attendance at Kitchener; review proposal and attend conference call with customer (Raymond); detailed emails to Aird & Berlis re Windsor lease matter, sales process; emails with Harrison Pensa re BMO unit; approve disbursements; production meeting; instructions to warehouse staff re inventory; review and amend customer agreements; emails with customer counsel (Baker McKenzie); emails with Windsor Landlord; data room instructions.	8.8
6/29/2023	Cestnick, Winston	On site at Kitchener location - opened location, and ran production meeting, calls with customer regarding asset releases, calls with suppliers negotiating continuing contracts, updating production schedule with required resin inputs, signing off on shipments.	9.1

Date	Name	Narrative	Hours
6/29/2023	van Alphen, Wendy	Attendance in Kitchener; Daily production meeting; Daily customer meetings: Raymond; Sun-Mar; Resin review meeting; discussion on resins and other components to be purchased; Prep and call with Raymond; Assistance with Bharat for cashflow walkthrough and updates; Various calls to customers, potential buyers and emails	11.2
6/29/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out - 17 - Prepare Deloitte payables/deposit reqs - 6 - Scan and send 7 payables to Stefano for approval - Print up logistics emails for resin delivered - attach to payments received - Email Young and Robin to send logistics from Kitchener for resin since May 26/23 - Review and go over with Lois Monts on Time PO's and invoices - Deal with Formerra and missing proforma from June 14th - resin needed asap - Discussion with Wayne from PC Outfitters re Mike Foulon's computer at Plant 2 - Email court order of receivership to Formerra again - not paying prior debts - Print up invoices to match PO's for approval	8.5
6/30/2023	Messina, Stephen	On site at Kitchener location. Made adjustments to bid allotment by virtue of reviews. Obtained key information to support production schedule for Injection Tech - Kitchener, began drafting for data room upload. Provided email responses to interested part	7.9
6/30/2023	Sleeth, Jordan	Call with Aird & Berlis re: 4350 landlord issues and SISP revisions.	0.8
6/30/2023	Brown, Rose	Trust Banking Adm - Prepare Disbursement cheques and wires. Send TD for process and input into Ascend. Scan of mail rec'd and send to onsite staff.	5.5
6/30/2023	Damiani, Stefano	Conference call and emails with Aird & Berlis re sales process, landlords; production meeting; review cash flow, approve disbursements, instructions to B. Khemani and S. O'Neill re required cash transfers; utilities matter; draft settlement and release agreements, instructions to W. Cestnick on same; emails with Whitney Realty, review building information; instructions to S. Messina re data room and sales process.	6.2
6/30/2023	Cestnick, Winston	On site at Kitchener location - led morning production meeting, prepared staffing list and schedule for coming week, prepared releases for customers (Sun-mar, audioscan, ramet), calls with suppliers regarding receivership and ongoing payment terms.	9.8
6/30/2023	van Alphen, Wendy	Various calls to customers, potential buyers and emails	1.8

Date	Name	Narrative	Hours
6/30/2023	O'Neill, Sandi	Open Plant 2; Approve shipments going out -14; Prepare Deloitte payables/deposit reqs - scan and send -7 TCF Rose re wires from Friday - disc on invoices needed for all sales deposits; Meet Wayne from PC Outfitters to image computers - set him up to start going through list of computers; Meet Jordan, Stefano, Stephen at Plant 1 in Windsor - down for a visit TCT to Entec-LM and emails with 4 people to get physical address for wire transfer Review payroll for this week Talk to Adam about his overtime	5.3
Total			584.1



Invoice 8003860866

Deloitte Restructuring Inc.

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: August 16, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the
receivership order dated May 26, 2023 for the period July 1, 2023 to
July 29, 2023.

Please see attached appendices.

HST applicable 389,799.50

Expense

Out-of-pocket Expenses:

- Accommodations - Hotel 7,699.08
- IT Equipment 141.65
- Transportation (e.g. mileage, taxi, public transit, tolls,
parking) 4,441.37

HST applicable 12,282.10

Sales Tax

HST at 13.00 % 52,270.61

Total Amount Due (CAD) 454,352.21

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8003860866	454,352.21	Payment for invoice 8003860866

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	69.2	725.00	50,170.00
Zajko, Lisa	Partner	0.5	725.00	362.50
Damiani, Stefano	Director	167.6	605.00	101,398.00
van Alphen, Wendy	Senior Manager - Contractor	147.7	525.00	77,542.50
Khemani, Bharat	Manager	60.3	475.00	28,642.50
Brown, Rose	Manager - Trust Accounting	29.9	350.00	10,465.00
O'Neill, Sandi	Manager - Consultant	134.9	350.00	47,208.00
Messina, Stephen	Senior	100.8	295.00	29,736.00
Cestnick, Winston	Analyst	121.7	250.00	30,425.00
Conorton, Laura	Analyst	50.2	250.00	12,550.00
Garcia, Andy	Analyst - Data Preservation	5.2	250.00	1,300.00
Total Professional Hours and Fees		888.0		389,799.50
Out-of-pocket Expenses				12,282.10
Accommodations - Hotel			7,699.08	
IT Equipment			141.65	
Meals			-	
Transportation (e.g. mileage, taxi, public transit, tolls, parking)			4,441.37	
Total Fees and Expenses (CAD)				402,081.60



Appendix #2

Work performed from July 1, 2023 to July 29, 2023

Date	Name	Narrative	Hours
7/3/2023	Damiani, Stefano	Review amended form of customer settlement agreement and email of Baker McKenzie (customer counsel); review detailed email re lease agreement; review correspondence with Livingston re customs arrangement; various emails.	0.8
7/4/2023	Messina, Stephen	Prepared SISP update for TD. Prepared updated draft of bid allotment, ready for reviews. Scheduled several site visits for both Kitchener and Windsor locations. Responded to buyer questions via email.	5.6
7/4/2023	Damiani, Stefano	Onsite attendance at Kitchener; telephone call and emails with Windsor Plant Landlord (Mr. Kay); correspondence with prospective bidders; meetings and emails with J. Deutschlander (Engineering Manager) re customer tool releases (various); email to M. Pedro (Aird & Berlis) re lease; email to Aird & Berlis re customer agreement; review insurance documents, emails with R. Pirillo (NFP) on same; production meeting; discussion re tools release; instructions re cash, payroll; revise customer agreement (Sun-Mar), email to W. Van-Alphen on same; review cash flow and approve disbursement requisitions; employee matters; data room instructions to S. Messina.	9.5
7/4/2023	Khemani, Bharat	Handling production and coordinating with customers for their respective updates on FG inventory and Resin releases	4.1
7/4/2023	Sleeth, Jordan	On-site attendance - draft license transfer letter for Cimatron license; respond to creditor; detailed cash flow review and provide comments to B. Khemani.	3.5

Date	Name	Narrative	Hours
7/4/2023	O'Neill, Sandi	Travel to Plant 2 - open up shop; Travel to Plant 1; Review emails from last night; Approve shipments going out -15; Prepare Deloitte payables/deposit reqs - 9; Print up logistics from Kitchener - attach to payments; Email Elite Security - guard not there at Plant 2; Go through payables cheques and wires sent - mark paid and file; Meeting with Plant 2 landlord and daughter - Joe Greco and Sally Bakos to discuss; Joe going to Plant 2 to water flowers and taking things out of his trailer - came up with an agreement - will pass on to security guard; Review payroll for Windsor and Kitchener - discuss changes with Debra - get approved from W. van Alphen; TCF John Robert re customers picking up after hours; Discuss and approve overtime for employees with W. van Alphen; Meeting Bill with keys to Plant 2 for bay doors to bring resin to Plant 1 - get keys back; Scan, rename and send payables to S. Damiani for approval; Email Rob Kolody approved PO's to get invoices from JaniSafe; Email Mike Foulon to get PO number for KoneCrane renewal contract - scan and email; KoneCrane signed renewal offer and to schedule inspections; Go over Enwin bills with S. Damiani and W. van Alphen to call tomorrow over rates and amounts; Go to Plant 2 to meet security guard -give key to bay doors - show him what doors to open;	10.3
7/4/2023	van Alphen, Wendy	Daily production meeting; Lucid customer release; Resin requirements/production forecast; Raymond call and prep of emails; Meeting on site with Daniele Capital; Various calls & emails with customers and suppliers	8.5
7/5/2023	Brown, Rose	Trust Banking Administration - Disbursement (wire & cheques), Input various Receipts, Pull online banking reports and reconciled to GL. Send Online banking report and Ascend GL to the Team.	6.7
7/5/2023	Messina, Stephen	On site at Kitchener location. Generated tracker for final sales push. Catered to two parties on site at Kitchener, answering questions and providing data. Coordinated site visits for Friday in Windsor. Generated bid instructions email. Generated support to reconcile rent payment at 41 Ardelt.	7.8
7/5/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference call with prospective bidder and private equity owner; conference call with prospective bidder and Windsor Landlord; review email of T. Van Klink (BMO counsel) and form of BMO lease assignment; prepare analysis and detailed email to T. Hogan (Harrison Pensa) re BMO; conference call; review customer dispute, call with customer counsel, instructions to staff; review response from M. Pedro (Aird & Berlis) re lease, detailed response; review and approve disbursements; emails with M. Bottero (Rosewater Group - Kitchener Landlord) re rent and construction; conference call with prospective bidder, respond to inquiries; email and telephone correspondence with M. Lorenti (Rosewater Group - Kitchener Landlord) re utilities; instructions to local management and B. Khemani re customer settlements.	9.7

Date	Name	Narrative	Hours
7/5/2023	Khemani, Bharat	On site at Kitchener plant - Coordinating with customers (Audioscan) for release of tools and inventory. Working on customer wise AR status till 30th June.	5.5
7/5/2023	Sleeth, Jordan	Various - attend call with Aarkel and Windsor landlord; cash flow call with B. Khemani; review buyer queries; review Accounts Receivable reporting and provide comments; update memo for TD.	3.5
7/5/2023	O'Neill, Sandi	Travel to Plant 1; Review emails from last night; Approve shipments going out -3; Prepare Deloitte payables/deposit reqs - 4; Scan approved cheq reqs to R. Brown - email to process; Print up wire confirmation for Dubois Chemicals; Check on Laura regarding shipments going out throughout the day; Email to and from Janice at Rogers re late charge on new bill; Email Netmon re link to Mike Foulon PO files; TCF/TCT Rose re questions on cheque reqs and support; Meeting with Duane, W. van Alphen, Lois and Mike Foulon on PO's - assist Mike with PO's; that have been paid and shipments received; Prepare deposit reqs for R. Brown - get back up - scan and send - 8; Assist Laura with Clek A/R and invoicing - confirm \$ received; Open mail as Pam off sick today; Email from Canteen of Canada - will continue service-forward email to AP to put order for supplies in; Receive and forward emails and pictures from Colin for shipments going in and out to Laura; Go through payables confirmed sent out by R. Brown - stamp paid and file away - send Mike Foulon email for PO's paid; Review A/R production and tryout invoices for Laura and Lou-Ann to send out; TCT/TCF Danielle at Enwin re waiving deposits of \$109,000 until new owners take over	9.8
7/5/2023	van Alphen, Wendy	Daily production meeting; Resin review meeting; discussion on resins and other components to be purchased; Review of Windsor payroll and prepare request for transfer of funds; Various emails and calls with customers; tooling customers; requests for resin; suppliers; ITI CF call with B. Khemani and S. Damiani; Review of purchase orders and resin/supply quantities	10.5
7/6/2023	Conorton, Laura	Processing wires to Washington Penn and Dubois Plastics for Inject Tech and Moldco Plastics; correspondence with team and TD bank; trust administration	2.5
7/6/2023	Brown, Rose	Trust Banking Administration - Disbursement wires sent to TD Bank. Input wire into ascend & prepare disbursement cheques, Pull online banking reports & reconciled to GL. Send banking report & Ascend GL to the Team. Scan & save Rec, Disb & SC Ltr on Q.	6.3
7/6/2023	Messina, Stephen	On site at Kitchener location. Provided responses to prospective bidders and prepared SISP update. Finalized and published lot package for buyers to access. Curated further data for the data room. Drafted bid instructions, bid email, lot package. Assisted in the coordination of site visits for Windsor. Coordinated payments to be made from the trust account to cover day to day operations.	8.3

Date	Name	Narrative	Hours
7/6/2023	Damiani, Stefano	Onsite attendance at Kitchener; emails with Lucid internal legal counsel; emails with EDC; production meeting; instructions to Shipping Manager and Engineering Manager re customer inventory and tool shipments; emails with M. Bottero (Landlord); emails with M. Pedro (Aird & Berlis) re lease assignment; meeting with employee; emails with Payroll Manager; site meeting with customer (Romet), instructions to Team re settlement agreement; call with prospective auctioneer; update Lucid agreement, compile data, email to Lucid counsel; prepare Bid Forms; telephone and email correspondence with prospective bidders; calls with W. Van Alphen.	9.2
7/6/2023	Khemani, Bharat	On site at Kitchener plant - Coordinating with various customers release of molds and inventory. Working on June month cashflows and AR status till 30th June.	6.3
7/6/2023	Sleeth, Jorden	Respond to bidder queries; update call with S. Damiani.	0.5
7/6/2023	O'Neill, Sandi	Travel to Plant 1; Review emails from last night; Approve shipments going out -3; Prepare Deloitte payables/deposit reqs - 4; Scan approved cheque reqs to R. Brown - email to process; TCF R. Brown re deposit vouchers needed for transfers- discussed getting some info from bank; Check on Laura re shipments going in and out - needed assistance with Clek invoicing-; talk to W. van Alphen about amounts to be voided and cleared; Pam off sick again today - talk to Lou Ann about cheques to be deposited - open mail; TCF Laura - Deloitte - looking for PO to be added to cheque req - find, scan and send; Respond to S. Damiani re manual calculations on Washington Penn cheque req; Get invoices from W. van Alphen and Lou-Ann for deposit req for Moldco account - prepare, scan and send to R. Brown; Print up invoices and proformas to be paid; Email court order to DLL collections; Email DMNS and Circle 5 indemnity agreement again for signature and release of material - talk to driver and send away -no release; TCF R. Brown re PLP monies went into wrong account - email them with correct wire info; TCF Madison at Wike Bike - following up on email re getting equipment from Moldco-advised W. Cestnick on vacation - gave her his number to call him next week; Meeting with Lois to go over PO's; Prepare payables for W. van Alphen to approve	8.0
7/6/2023	van Alphen, Wendy	Daily Raymond meeting; Resin review meeting; discussion on resins and other components to be purchased; Cashflow discussion with J. Sleeth & B. Khemani; Meeting with David Ulrich - Stefan KB Components; Open PO's; payments and production requirements	11.2
7/7/2023	Brown, Rose	Trust Banking Administration - Prepare transfer between accounts, Input deposit rec'd, Pull online banking report & Ascend report - reconcile to Ascend & send to the Team. Scan of SC Letters.	4.5

Date	Name	Narrative	Hours
7/7/2023	Messina, Stephen	On site at Kitchener location. Updated the bid lot package, sent out bid instructions to all parties who have signed an NDA. Communicated with several interested parties via phone and email, providing responses to questions about bid process and company. Generated the first draft of the bid proposal tracker to be used on Tuesday as bids flow in.	6.4
7/7/2023	Damiani, Stefano	Conference call with EDC re A/R credit insurance policies; production meeting; amend and finalize bid instructions email; finalize bid forms; telephone and email correspondence with prospective bidders; calls with H. Bricks re sales process; various emails; correspondence with Lucid counsel; review BMO lease information and prepare summary for the data room; instructions to local management re inventory counts and customer invoicing; review disbursement requests.	9.4
7/7/2023	Khemani, Bharat	On site at Kitchener plant - Coordinating with various customers release of molds and inventory. Working on June month cashflows and AR status till 30th June.	4.5
7/7/2023	Sleeth, Jorden	On-site attendance - review bid forms and cover email, consider bid extension, provide comments; tour facility; team status update meeting.	2.5
7/7/2023	O'Neill, Sandi	Travel to Plant 1; Busy morning in the bays - check on Laura re shipments going in and out; Review emails from last night; Approve shipments going out -5; Prepare Deloitte payables/deposit reqs - 7; Deposit slip for Moldco - TCT Lisa @ Eldorado to get PO and invoice for R. Brown; TCF Rose re PLP deposit - doing transfer for S. Damiani to sign; Pick up cheques from Lou-Ann for deposit to give to Pam; Catch up with Pam on what is needed as she was off sick for 2 days; Email indemnity agreement to Aarkel for release of material; Talk to Wendy regarding IT's accounts - need invoices from Lou-Ann - go talk to; Lou-Ann and discuss what is needed from May 26/23 to present; Call with S. Damiani on Harrison Pensa legal bill and Erwin bill; Meeting with Debra - HR - print up employee ltr - discuss on hiring back for Plant 2- advised to wait until approved by W. van Alphen and Duane; TCT Debra - HR re vacation, sick days, etc. for salary employees; Review email being sent to salary employee regarding vacation and sick time Colin is off today - go down and talk to Archie regarding process of shipments; going in and out; Email from Livingston on shipment being held at border - review paperwork - talk to Duane and W. van Alphen to release from funds on hand-email Livingston ok to release; Meeting with Duane, and W. van Alphen and Lois re hiring employee for Plant 2 for next week-email Debra and Marty to advise; Meeting with Duane and W. van Alphen re salary staff not understanding about their vacation pay on cheques and wanting vacation pay paid to them; Scan and email 7 payables to S. Damiani for approval	9.0

Date	Name	Narrative	Hours
7/7/2023	van Alphen, Wendy	Various calls to customers, potential buyers and emails; PPAP plastics tour and questions; Discussion with Lindsay - Daniele Capital; Review of various agreements - Customer releases; Prep of IS - department - Windsor/Kitchener; Meet with Brian Bendig; Meeting with B. Khemani re Sales & AR roll forward; Meeting with Pangeio; Review resin requirements with Duane, Lois, Sandi; Preparation of Lucid proforma invoices and invoices - compare to PO	9.0
7/9/2023	Damiani, Stefano	Review proposed changes to settlement agreements, execute agreements, and emails with customer on same (Sun-Mar); email correspondence with prospective bidders; review A/R summary and report of B. Khemani; production customer emails; review and approve disbursements requests, instructions to S. O'Neill on same.	2.9
7/10/2023	Brown, Rose	Trust Banking Administration - Prepare of Disbursement cheques, Input deposit rec'd, Pull online banking report & Ascend report - reconcile to Ascend & send to the Team. Scan of SC Letters. Review online banking to confirm incoming wire for SD.	4.7
7/10/2023	Messina, Stephen	On site at Kitchener location. Sent final reminders to all bidders, answered bidder questions on email and phone. Prepared offer tracker template for sorting of deals.	7.3
7/10/2023	Cestnick, Winston	on site at Kitchener location - orchestrated production meeting, provided to-dos for production staff, oversaw inventory shipments and signed off on outgoing shipments, calls with customers regarding tool releases, compiling customer release documents	8.3
7/10/2023	Sleeth, Jorden	On-site attendance - call with TD and counsel re: SISP activity, operations update, SISP analysis timing; review cash flow and AR reporting; facility tour; various conversations with W. van Alphen and S. Damiani.	3.6
7/10/2023	Damiani, Stefano	Onsite attendance at Kitchener; calls and emails with prospective bidders; production meeting; emails with customers re settlement agreement (Sun-Mar, Lucid, Raymond, Solinst), & draft amendments; emails with J. Thrasher of NFP (Insurance Broker); emails with toolmaker; telephone call and emails with R. English (Aird & Berlis) re sale process; review disbursements; conference call with TD and counsel; emails with Mr. Kay (Windsor Plant Landlord); emails with Kitchener Landlord; meeting with plant manager; call with W. Van Alphen; correspondence with Skyjack counsel, review listing.	9.1

Date	Name	Narrative	Hours
7/10/2023	O'Neill, Sandi	Laura off today- Approve shipments going in and out - 8; Review emails from last night; Prepare Deloitte payables/deposit reqs - 10; Print approval for cheque run - scan and email to everything to R. Brown; Review cheques with W. van Alphen to ensure proper postings - redo deposit req to change GL code; Review and approve expenses for employees re mileage, boot allowance; TCF/TCF Debra to discuss above, ask questions, etc.; Print up email from W. Cestnick and S. Messina re invoices, bills. Answer S. Messina re bill for hotel room for one employee - do not do up cheque req - send to me; and will give to Debra to add to his pay cheque; Review email from W. Cestnick re Livingston - forward to Zena and ask her to take off; funds on deposit; Email Intellimeter court order and instructions to change name on cheque to Deloitte; and continue to mail to IT in Windsor; Ask W. Cestnick to get wire transfer info for excel wire - ask Pam for wire info for Microsoft; Email MDM that we are paying the bill.; Go through mail from Ministry of Finance and EHT - follow up to call them tomorrow	8.0
7/10/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Update call with TD; Discussions with Skyjack; Raymond agreement, discussions with Jeff regarding tools; Discussions with Jeff regarding; Update on Sumar agreement; Update on Lucid agreement; Review of cashflow, AR roll forward, and deposit requisitions; Calls with Aarkel; Daniele; Mega Mold; Cavalier; meeting with Bob Clays; Call with Pangeo	8.5
7/11/2023	Conorton, Laura	Processing wire payments to Darshan Brass, Materials Group, trust administration, correspondence with TD, providing bank account details, locating incoming wire	2.5
7/11/2023	Brown, Rose	Trust Banking Administration - Prepare of Disbursement cheque, Input deposit rec'd, Pull online banking report & Ascend report and send to team. T/T Bank to inquiry about incoming wire.	2.4
7/11/2023	Messina, Stephen	On site at Kitchener location. Answered bidder questions on email and phone, discussing the possibility of their bids etc. Sorted, catalogued and began running analysis on 17 bid proposals received from 15 interested parties.	7.6
7/11/2023	Cestnick, Winston	on site attendance at Kitchener location - compiled customer requests and production requirements for morning meeting, ran production meeting, calls with customers regarding AR collections and mold releases, prepared customer releases, signed off shipping	8.1

Date	Name	Narrative	Hours
7/11/2023	Damiani, Stefano	Onsite attendance at Kitchener; review Aviva insurance endorsement; conference call with J. Thrasher (NFP Insurance); correspondence with customers re payment, settlements; emails and telephone calls with prospective bidders; review bids and commence comparison analysis; emails with R. English (Aird & Berlis); instructions to S. O'Neill re CRA; review and approve disbursements requests and wires; review customer proposal re mold bases and ancillary equipment, comments to D. Humphries on same; review Romet agreement.	9.5
7/11/2023	Sleeth, Jordan	On-site attendance - SISP process: follow up with prospective bidders, review bids, review offer summary and supplement same, circulate follow up questions to auctioneer bidders; insurance call with NFP broker; CRA responsiveness issues - consider approach; review cash flow and AR summary, prepare cover email for TD and circulate same.	6.8
7/11/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night; Prepare Deloitte payables/deposit reqs - 5; Review email from S. Damiani re CRA and new accounts for IT; TCT Richard Moon-Wan from CRA - LM - emailed as well; TCF R. Brown re questions on wires going out and coming in; Discussion with W. van Alphen on bid deposits coming in today - email R. Brown and advise; Emails back and forth with Richard Moon-Wan from CRA regarding new accounts; Talk to Lou-Ann and Laura re invoice from Monts On Time - Laura will email to get one; Work with Pam to get address and wire information for Microsoft to pay bill; Prepare credit note cheque req for R. Brown on Livingston; Check in with Laura re shipments going in and out; Discuss with Pam what to send to Microsoft - court order - answer Microsoft questions; regarding receivership; Talk to Lois re invoices for resin requisitions; Talk to John Robert re Aarkel coming in to pick up mold tonight - go find Collin to let him know; Review production and try out invoices for Laura and Lou-Ann to send out	7.5
7/11/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review of submitted bids; Deposit rec. help with bids; Raymond agreement, discussions with Jeff regarding tools; Update calls with various customers; Various calls with bidders; Discussions with Accucam; Call; emails Rollstamp	9.0
7/12/2023	Conorton, Laura	Processing wires for Inject Tech and Moldco Plastics to Excel Wire and Premier Plastic, Updating creditors and re-sending notices, correspondence with TD, trust administration	2.3
7/12/2023	Garcia, Andy	Updating Control sheet. Creating TC/WC in Rel evidence management + Control Sheet + COC Form	0.7
7/12/2023	Messina, Stephen	On site at Kitchener location. Continued to sort and catalogue bid proposal information, updating our Offer Tracker with relevant data (cure costs, insurance, rent, utilities etc.) to be considered as part of each offer. Conducted analysis on all offers.	7.1

Date	Name	Narrative	Hours
7/12/2023	Brown, Rose	Trust Banking Administration - Prepare of Disbursement cheques, Input deposit rec'd, Pull online banking report & Ascend report and send to team. Review LC daily Banking and GL reports.	2.8
7/12/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, calls with customers including Pi Manufacturing, Solinst, Raymond, and Romet. Orchestrated AR collections, communication with customers on information, prepared customer releases	9.3
7/12/2023	Sleeth, Jordan	On-site attendance - internal bid review call, finalize bid summaries with responses from auctioneers, calls with certain auctioneers, circulate bid summary to A&B, call with A&B re: same, draft shortlist auctioneer email for round 2 offers; emails to J. Latham re: estate update; update memo to receiver team, call re: same.	6.5
7/12/2023	Damiani, Stefano	Review clarification points from auctioneers; bid chart; draft clarifying questions and emails on same; production meeting; emails from customers re shipments; review and approve disbursement requests and wire payments; emails with Lucid, amend settlement agreement; calls with W. Van Alphen; emails re A/R collection status.	8.4
7/12/2023	O'Neill, Sandi	Approve shipments going in and out - 5; Review emails from last night; Prepare Deloitte payables/deposit reqs - 13; Issues with Cascades invoices. Discuss with Lois - sent email for explanation and new invoices; Go over deposit with Pam re pre or post receivership; Tracking bids - print up online bank statements, emails from deposits - gather up paperwork; Work on getting wire information for Cristian for deposit made to Moldco; Mark wires and cheques paid from email from R. Brown and file away; Print up PO's and invoices for material purchases; TCF Melinda at ZF Group regarding her email from yesterday - discussed with Duane and W. van Alphen - email her back re info needed - email Pam and Dan Demers for paid invoice and inventory list at Plant 2; Email court order re receivership to The Material Group and Stratosphere Quality - explain prior debts are stayed; Correspond with Microsoft on paying bills by cheque - not understanding receivership - asked to escalate request; Receive and forward wire confirmations for Premier, Excel and Darshan; Gather up and print all supporting documents for bid deposits; Scan and email deposit reqs to R. Brown and S. Damiani and cheque reqs to S. Damiani for approval	9.0
7/12/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review of cashflow, AR roll forward, and deposit requisitions; Review with S. Damiani re Raymond; AR Rec. with Raymond; Lucid agreement and pro forma invoices; Review of certain bids; calls with TD and Aird Berlis; Review of priority AR/FG Kitchener and call with W. Cestnick & B. Khemani; Discussion with group re required resins; and orders; Call with Skyjack and Marble	8.3

Date	Name	Narrative	Hours
7/13/2023	Brown, Rose	Trust Banking Administration - Scan & saving Disbursement requests, Input deposit rec'd, Pull online banking report & Ascend report and reconcile and send to the team.	2.5
7/13/2023	Conorton, Laura	Correspondence with team, online banking administration, recording receipts, processing wire to Materials group	2.0
7/13/2023	Messina, Stephen	On site at Kitchener location. Provided analysis on auctioneer proposals, building an in-depth comparison between the remaining players involved and costs incurred to each. Spoke to all shortlisted strategic buyers on the phone, taking notes and providing questions via email. Assisted in the formal communication to all parties involved. Began preparing a summary of deals made in presentation format for counsel / bank.	6.7
7/13/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference calls and detailed emails with shortlisted bidders; emails with R. English (Aird & Berlis) re sales process; emails with customers; review amended settlement agreements; e-mail to M. Pedro (Aird & Berlis) re lease costs schedule; production meeting; correspondence with Kitchener Landlord; calls with J. Sleeth and W. Van Alphen; review and approve disbursements and wire payments; CRA update; meeting with Controller re cash reporting and A/R; meeting with Engineering Manager re tool listings; e-mail to counsel re customer agreement; finalize and executed the Raymond settlement, emails on same.	9.4
7/13/2023	Sleeth, Jordan	Various - calls with bidders to clarify bids, invite to shortlist round and request round 2 bid, review and comment on shortlisting instructions; operating discussions with W. van Alphen & S. Damiani; review cash flow update.	5.1
7/13/2023	Cestnick, Winston	on site attendance at Kitchener location - facilitated morning production meeting, led search for and identification of key tools and equipment to be sold to customers, calls with customers regarding information needed & negotiating payment	9.2

Date	Name	Narrative	Hours
7/13/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night; Prepare Deloitte payables/deposit reqs - 14; Email Zena at Livingston regarding shipments being held at the border; Talk to Marty Humphries about the 2 employees showing up at Plant 2 today - we went over scenarios - line shutting down for 2 weeks, etc. - will discuss with W. van Alphen and Debra-HR about termination; Review email from J. Sleeth - get information from Pam regarding security deposit for Plant 2; scan and email bank statement to J. Sleeth; Print up logistics and attach to cheque reqs - mark received; TCT Debra-HR re conversation with Marty Humphries - advised W. van Alphen - she went over to Plant 2 to have a meeting with Debra-HR and the 2 employees; Confirm with Livingston that held shipments can be taken from funds on hand and to release; TCF Sieglund from Polytech - confirmed bank account information for transfer - will be coming tomorrow or on the weekend; Review bills with W. van Alphen and Pam from Sunlife EAP - ask Pam to send court order for receivership and ask to cancel plan; Scan and email cheque reqs to S. Damiani for approval; Print and scan approval for The Material Group wires and send to RS Trust; Scan and email 8 more cheque reqs to S. Damiani for approval; Forward wire confirmation to Lois; Respond to Cristian about wire coming in	10.5
7/13/2023	van Alphen, Wendy	Bid packages calls; discussion with Aarkel and various calls; Call with S. Damiani to review bids; Strategy session; Call with Skyjack and Marble; Lucid agreement; Finalize Raymond agreement; Bank call	7.5
7/14/2023	Conorton, Laura	Preparing wires to SunLife, Nexeo, Formerra; preparing reports, tracking incoming wires, recording receipts, entering cheques, trust administration	3.7
7/14/2023	Damiani, Stefano	Production meeting; conference call with TD and counsel; telephone discussion with T. Hogan and R. Danter (Harrison Pensa); review detailed responses from shortlisted bidders; issue emails for resubmission of offers; draft rejection emails to bidders; emails with Lucid and counsel re settlement; detailed email to Deloitte Tax; emails with Lucid; review list of A/R and inventory, instructions to team and Controller re settlement agreements.	4.9
7/14/2023	Messina, Stephen	Provided responses to all rejected bidders and finalized our summary of offers received for counsel and the bank. Documented responses to clarifying questions received from shortlisted bidders.	5.8
7/14/2023	Cestnick, Winston	on site attendance at Kitchener location - compiled customer needs, ran morning production meeting, scheduled production outputs in excel and modelled expectation for coming week, preparation of legal release documents for customers, calls with customers	6.5

Date	Name	Narrative	Hours
7/14/2023	Sleeth, Jordan	On-site attendance - SISP results call with TD and counsel, debrief and next steps meeting with S. Messina and S. Damiani; review rejection emails for unsuccessful bidders; review and approve Raymond settlement; review email to counsel to BMO; call with Aarkel CEO, follow up call with D. Humphries; memo to A&B re: Windsor landlord engagement; finalize offer summary and circulate to TD.	5.2
7/14/2023	Khemani, Bharat	On site at Kitchener plant - Working on customer releases and updating daily cashflow	4.2
7/14/2023	van Alphen, Wendy	Daily Raymond call; Daily Production call; Responses to Raymond regarding shipping; Call with W. Cestnick regarding Care Hawk and KM; Calls with CRA Auditor; CRA in order to receive on-line access; Group call re status; Call with W. Cestnick regarding Care Hawk and KM; Group update call	7.2
7/16/2023	Damiani, Stefano	Call with M. Nowina (Baker McKenzie) re Lucid; emails with Lucid, amend and execute agreement; emails with L. Zajko (Deloitte Tax); email from J. Yantzi (Aird & Berlis) re Lucid; emails.	2.6
7/17/2023	Zajko, Lisa	Review queries on return of fixtures/molds and duties/border implications - research and response; brief discussion with Stefan	0.5
7/17/2023	Garcia, Andy	Verifying 8 images in EnCase.	1.5
7/17/2023	Conorton, Laura	Collecting reports, correspondence with team and bank on incoming test amount, reviewing online banking and inputting deposit amounts	1.5
7/17/2023	Messina, Stephen	On site at Kitchener location. Processed bid data into easily comparable chart assessing the costs/benefits to each bid as well as the conditions or contingencies.	6.3
7/17/2023	Damiani, Stefano	Production meeting; telephone call with J. Yantzi (Aird & Berlis) re settlement agreement; customer emails re settlement payment (Eldorado); telephone and email correspondence with Shortlisted Bidders; detailed emails to Aird & Berlis; telephone call and emails with R. English (Aird & Berlis), call and email correspondence with P. Mund (Mund Realty) re Windsor Plant lease; voicemail to Mr. Kay (Windsor Landlord); review statements and financial information, prepare estimated cure costs schedule re Windsor lease; review bid analysis, call with S. Messina on same; emails with Lucid re settlement, payment, shipments; review and approve disbursements; instructions to team re production, customer matters, cash flow; coordinate return of deposits to rejected bidders; calls with W. Van Alphen; review and amend customer settlements, comments to W. Cestnick.	9.2

Date	Name	Narrative	Hours
7/17/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, scheduled site visits for customers to view inventory and molds, prepared customer releases, call with delivery suppliers to negotiate terms and pricing for receivership	7.5
7/17/2023	Khemani, Bharat	Working on customer releases and updating daily cashflow	3.9
7/17/2023	O'Neill, Sandi	Approve shipments going in and out - 4; Review emails from last night -85 print invoices, logistics, respond to emails; re old invoices - send out court order; Prepare Deloitte payables/deposit reqs - 8; Talk to Laura re Friday - any issues - incident at Plant 2 - text from security guard; Meeting with W. van Alphen to catch up from Friday; Confirm wires from bank account - date stamp and file; Meeting on Teams with W. van Alphen, J. Sleeth, S. Damiani, S. Damiani and W. Cestnick - go over updates, status on sale, etc.; Review and approve production and tryout invoices for Laura and Lou-Ann; Review overtime hours with W. van Alphen for approval; Review expenses for approval and send to add on payroll; Review and approve Mike Foulon and Ali's expenses; TCF City of Windsor to ask questions re property taxes on 4350 Industrial Drive - go online - print up form to complete and email back with court order; Approve overtime for Steve Dean; Review and approve payroll for Kitchener - call Debra with some questions; Review and approve payroll for Windsor - call Debra with some questions - reviewed; both with W. van Alphen - sent approval for both; Scan and email cheque reqs and approvals to RS Trust - discuss questions with S. Damiani - print up bid forms to send with cheque reqs and return bid offered	8.0
7/17/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Update on Lucid agreement; Review of payroll and request for funds from TD; SISP update and various calls to potential bidders; Cure costs on 4350 Industrial; Review of update bids from auctioneers & going concern buyers; Update on Lucid agreement; Start on ERV; discussion with B. Khemani to balance and tie in AR roll forward; correction of same; Review of resin requirements and approval; Discussions with W. Cestnick regarding releases, mold releases and review of same; Review of bid deposit returns; Discussion with B. Khemani on errors on roll forward of AR and correction of same; discussion with B. Khemani on update of daily cashflow and distribution to Deloitte personnel only; Review of offer tracker; call with staff re updated bid chart & analysis; correct & amend schedule for bank and legal review	8.0
7/18/2023	Conorton, Laura	Entering and printing cheques for Injection and Moldco, wire to Chase Plastics and ABSA, reporting, online banking account management, correspondence with TD, stop payment	4.8

Date	Name	Narrative	Hours
7/18/2023	Messina, Stephen	On site at Kitchener location. Received all bids from shortlisted bidders. Began compiling all information into a chart comparing the first bid vs second bid for the bank and counsel to assess how the bids have progressed over the course of the week.	6.8
7/18/2023	Damiani, Stefano	Telephone and email correspondence with Shortlisted Bidders; review revised bids and analysis; review and amend customer settlement agreements, instructions to W. Cestnick on same; production meeting; instructions to B. Khemani re cash reporting; review disbursement packages and sign wires; call with R. English (Aird and Berlis); emails.	8.8
7/18/2023	Cestnick, Winston	on site attendance at Kitchener location - compiled and prioritized order of upcoming customer releases, ran morning production meeting, prepared customer releases and orchestrated receipt of payment, calls with customers regarding process and info needed	8.3
7/18/2023	Sleeth, Jordan	Review tool release email and provide comments; review bid summary and option analysis	0.7
7/18/2023	Khemani, Bharat	On site at Kitchener plant - Working on customer releases, updating daily cashflow and previous week's AR report.	4.9

Date	Name	Narrative	Hours
7/18/2023	O'Neill, Sandi	Approve shipments going in and out - 5; Review emails from last night; Prepare Deloitte payables-4; Prepare Deloitte deposit reqs - 8; Scan and email Chase Plastics cheque req for approval then to RS Trust; TCF Eldorado Plywood to confirm if we rec'd money - checked Moldco bank account- emailed her back advising yes we received the money; Discussion with Rob Kolody re JaniSafe and out of bags and questions number of days for bereavement days - grandfather passed away - tct HR to confirm - 3 days; Emailed Kone Cranes to follow up on booking crane inspection - payment was sent out early July; Received ok for Machinery Network to send CAD funds back to them - scan all info on return; bids to send to RS Trust; Email TD bank for assistance on wire issues with Darshan Brass India - customer emailed with; problem not going into account because of name on invoice; Talk to Lois re Mike Foulon leaving - Lois going on vacation for 2 weeks - will set up meeting with Duane, W. van Alphen, Lois and myself to discuss; Meeting with Duane, W. van Alphen and Lois to discuss Mike Foulon leaving and Lois' two week vacation. Will have Ali come over for some training and have her fill in; Lois advised that her phone can't make calls out. TCT Rogers regarding account suspended due to non payment - paid back on June 30th - emailed RS Trust to stop payment on cheque and will issue a wire payment once cheque has been cancelled. Service taken off of suspension; Discussion with Debra - HR - advised Jamie from Quality resigned - meeting with Duane and W. van Alphen to discuss replacing, etc.; Pull out all cheque reqs - date stamp and file; Scan, rename and email deposit reqs to RS trust and S. Damiani and B. Khemani; Print and review email from S. Damiani regarding Enwin. Will call tomorrow to see if they received the cheque.; Send creditors and collection agency copy of court	7.7
7/18/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Various questions from staff; Negotiations with Accucam and follow-up; Calls to CRA re audit results; Call with CRA to allow upload of audit info; Review of AR and collections update; Review of expenditures and various approvals; Call; emails Rollstamp	9.0
7/19/2023	Conorton, Laura	Processing receipts, wire to Rogers, entering cheques, reports, correspondence, filing and trust administration	4.5
7/19/2023	Garcia, Andy	Beyond Compare TC/WC #2. Putting drives away in vault, updating evidence management. Creating TC/WC#2 in evidence management, Adding 8 evidence and 24 images to evidence management.	3.0
7/19/2023	Messina, Stephen	On site at Kitchener location. Finalized analysis from updated bids received from shortlist. Compiled all data into chart for the bank and counsel to assess. Further developed our financial model assessing the top bids against each other.	4.3

Date	Name	Narrative	Hours
7/19/2023	Damiani, Stefano	Telephone call and emails with T. Hogan (Harrison Pensa); emails with the Windsor Warehouse Landlord; review executed release and emails with Autosystems; review and approve disbursements; call with customer (Skyjack); review and approve disbursements and wires; review detailed email from R. Danter (Harrison Pensa) re lease, provide comments on same; review email of M. Lici (Aird & Berlis) and amended settlement agreement; daily cash update; instructions to team and company staff; call with counsel re bids; draft letter to customers, discussion with W. Van Alphen on same; review employee contract, email to counsel on same.	8.5
7/19/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, signed off on outgoing shipments, calls with customers negotiating payment for inventory on hand, organizing tool releases, preparing release documents, scheduling staffing	8.0
7/19/2023	Sleeth, Jordan	Review revised offers and related summary; call with Aird & Berlis re: bids and go forward strategy with GC offer vs. liquidation offer; memo to TD Bank re: same.	2.5
7/19/2023	Khemani, Bharat	On site at Kitchener plant - Working on customer releases and updating daily cashflow	5.3
7/19/2023	O'Neill, Sandi	Approve shipments going in and out - 5 - check on Laura - very busy day 28; shipments going in and out - helping out; Review emails from last night ; Prepare Deloitte payables-3; Prepare Deloitte deposit reqs - 1; Respond to email from India re wire issues; Scan, rename and email 4 cheque reqs to S. Damiani for approval; TCT Enwin re overdue bill - rec'd cheque July 13th - advised to ignore overdue notice-asking to waive water deposits on bills - got them waived; TCF L. Conorton - RS Trust - discussed deposit reqs - changing bank charges codes - asked for the # of cheque reqs for today; Print up logistics - attach to payments; Email back and forth with Noel from TD re wire issue for India; Send court order to customers re outstanding balances; Email lawn maintenance guy court order and ask to continue services - advise will pay June's bill but not May's; Prepare deposit req - scan, rename and email to RS Trust; TCT Debra - HR - looking for employment letters for Windsor and Kitchener - received copies of sample hourly and salary ones and forward to W. van Alphen and S. Damiani; Emails back and forth with B. Khemani re questions on GL - emailed L. Conorton to get printouts of current GL and Ascent GL; TCT Fedex to resume service - email court order and ask to resume services - waiting for response; Review A/R invoices for Lou-Ann to mail out; Receive wire confirmation for Rogers - forward to payment centre for proof of payment; Print up payables - file away to pay net 15-30 days; W. van Alphen off tomorrow - go over what is required for tomorrow - call Alift, City of Windsor, etc.; Scan, rename and email 1 cheque reqs to S. Damiani for approval	7.8

Date	Name	Narrative	Hours
7/19/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review of cashflow, AR roll forward, and deposit requisitions; Review with S. Damiani re Raymond; AR Rec. with Raymond; Call with Skyjack and Marble; FU with Accucam; FU with CRA; Call with legal counsel(s) and Deloitte regarding updated bids; Various calls with customers, staff issue, and resin/component approvals	8.0
7/20/2023	Conorton, Laura	Processing wire, cheques and deposits at bank. Reports, correspondence with team on banking reports	3.5
7/20/2023	Messina, Stephen	Updated the post-receivership ERV with May 25th values for MPI. Coordinated payments with respect to deposit returns and waste management at 41 Ardelt. Examined rent payment step-ups at 41 Ardelt.	2.8
7/20/2023	Damiani, Stefano	Emails and conference call with shortlisted bidder; production call; emails re Magna tool release; emails and telephone call with Mr. Kay (Windsor Plant Landlord) re insurance; review equipment lease documentation and emails with lessor; emails with R. Danter (Harrison Pensa); call with J. Sleeth; email to J. Thrasher (NFP) re insurance; emails with TD and counsel; emails with S. Bakkos (Warehouse Landlord) re security deposit; email to M. Lorenti (Kitchener Landlord).	8.0
7/20/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, organized resin counts and confirmations for customer releases, did delivery runs for material and hardware needed for production, oversaw and signed off on outgoing shipments	8.8
7/20/2023	Sleeth, Jordan	Calls with M. Lafortune and R. English re: bids; call with X. Yu re: bids; calls with GC Bidder re: clarifying terms, circulate update memo to TD and A&B.	2.0
7/20/2023	Khemani, Bharat	On site at Kitchener plant - Working on customer releases and updating daily cashflow	5.5

Date	Name	Narrative	Hours
7/20/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night ; Prepare Deloitte payables; Prepare Deloitte deposit reqs -1; Scan, rename and email approval and cheque req for Ineos wire to RS Trust; Print up invoices from Formerra, Rogers amd Muir Tapes; Emails back and forth to TD and Darshan re wire issues - email Darshan copy of the court order and see if the bank will take that before sending money back; TCF Alift to confirm quotes and send approval to go ahead with fixing forklifts - email quotes back - Randy will order parts and set up schedule to come and repair; Pull payables after receiving confirmation from RS Trust - date stamp paid and file; Discuss with John Robert re bag order - ran out - ask Lois to call JaniSafe for order - added stuff for Kitchener - updated PO - advised John Robert stuff will be here tomorrow; TCT City of Windsor - got details of final tax bill for 2022 and 2023 - emailed S. Damiani and W. van Alphen results of call; TCF Enbridge automated message - bill overdue - will pull last bill and call them for details; TCT Enbridge for details - rec'd both bills through email - got set up on e-billing - bills were mailed to Deloitte Toronto - didn't receive them yet - Enbridge noted file -waived late fee - reviewed bills - did up cheque reqs for approval - scan, rename and emailed to RS Trust once approved to do up cheques and mail out; Review and approve production invoices for Laura to be mailed out; Discussion with Marty about lift may be getting picked up at Plan 2 tonight - email Elite Security to advise security guard at Plant 2; Approve overtime for Devon on 1250 ton; Pull cheques, date stamp and file; Go over Rogers bills with Pam to take more names off the list	7.5
7/21/2023	Damiani, Stefano	Review amended form of APA from counsel, emails with J. Yantzi and R. English (Aird & Berlis), provide detailed comments on APA; review and approve customer settlement agreements, instructions to W. Cestnick on same; planning call re Rollstamp; call with J. Thrasher (insurance broker); call with W. Van Alphen re settlements, and emails with M. Lici (Aird & Berlis) on same; instructions re shipping matters; email correspondence with customers.	5.4
7/21/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, scheduled staffing for production vacations, updated production excel and forecasts, calls with suppliers re: resin needed, preparing customer releases	7.9
7/21/2023	Sleeth, Jorden	Review updated APA and provide comments.	0.3
7/21/2023	van Alphen, Wendy	Daily Raymond call; Daily Production call; Call with Rollstamp and update & pre Rollstamp call; Resin requirements call; Preparation of: Discontinuing production letter and obsolete tools pickup requirements review; Various calls, review of release agreements, Review of AR, AR roll forward; Review of ERV template	8.5

Date	Name	Narrative	Hours
7/22/2023	Damiani, Stefano	Review Skyjack correspondence; review various customer settlement agreements; emails; review Kitchener inventory listing.	2.9
7/23/2023	Sleeth, Jordan	Planning call with S. Damiani & W. Van Alphen, email memo to onsite team, update task tracker; review APA, customer release letters and provide comments on same to Aird & Berlis.	2.5
7/23/2023	Damiani, Stefano	Prepare and attend call with J. Sleeth and W. Van Alphen; review checklist; telephone call with S. Moutoux (Plant Manager); review APA amendments and emails of Aird & Berlis on same; emails re production.	2.8
7/24/2023	Conorton, Laura	Reports, recording incoming deposits, processing wires and cheques to various payees	3.1
7/24/2023	Messina, Stephen	On site at Kitchener location. Researched local talent agencies and received several quotes for forklift drivers available in the area. Developed contact list for customers with obsolete tools on hand. Contacted several ad agencies to resume advertising.	5.9
7/24/2023	Sleeth, Jordan	On-site attendance - team planning call/meeting re: bids, path forward; call with R. Haas of Corporate Assets; staff retention considerations and directions to W. Cestnick; approve deposit returns; update email to TD; cash flow review; team catchup call; warehouse tour, email to W. van Alphen re: FG inventory.	5.5
7/24/2023	Damiani, Stefano	Emails with Autosystems; production meeting; Raymond customer update; planning call re Kitchener plant; calls and emails with R. Haas (Corporate Assets); conference call with R. English and M. Lici (Aird & Berlis) re production, letters, APA; review, approve cheque requisitions, sign wires; emails with Mr. Kay (Landlord) re property taxes and July rent; e-mails with M. Lorenti (Kitchener Landlord); Kitchener staffing matter, KERP discussion; approve temp agency proposal; revise production agreement, call with W. Van Alphen on same; review cash reporting; review Skyjack summary; review tool list; review cash reporting, call with B. Khemani on same; review and amend obsolete tools letter, emails with counsel on same.	7.6
7/24/2023	Cestnick, Winston	on site at Kitchener location - emails to customers coordinating site visits, ran morning production meeting, preparing release documents for customer tools, calls negotiating inventory release prices with customers	7.8
7/24/2023	Khemani, Bharat	Working on daily cashflow and weekly AR report	4.5

Date	Name	Narrative	Hours
7/24/2023	O'Neill, Sandi	Travel to Plant 1; Approve shipments going in and out - 4; Review emails from last night - 98 emails to review from Friday; Prepare Deloitte payables- 13; Prepare Deloitte deposit reqs - 4; Print invoices for payment, respond to Cintas outstanding invoice; Email back and forth with Debra-HR - approve overtime for employees, discussed staff being off, get emails for salary staff so W. van Alphen can email them to notify HR of absences; Email back and forth with W. Cestnick re Dubois Chemicals; Email customers resin release authorization for signature and to remove resin; Scan, rename and email all Deloitte payables to S. Damiani for approval; TCT City Hall re taxes to confirm payment made by Landlord on taxes after July 19; now credit sitting on account - email S. Damiani results of conversation; Order toner cartridges from Staples for Lou-Ann and Laura on WVA credit card; Cancel Nexeo wire per W. van Alphen - email RS Trust, S. Damiani and W. Cestnick to cancel; Scan, rename and email Deloitte deposit reqs to RS Trust, S. Damiani and B. Khemani Review and approve try out invoices for Lou-Ann to send out	8.0
7/24/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Update on Lucid agreement; Review of payroll and request for funds from TD; Cure costs on 4350 Industrial; Update on Lucid agreement; Review of APA; Review of resin requirements and approval; Discussions with W. Cestnick regarding releases, mold releases and review of same; Review of bid deposit returns; Various calls with customers, staff issue.	8.5
7/25/2023	Conorton, Laura	Processing wires, cheques, reports, receipts, trust administration, filing	5.8
7/25/2023	Messina, Stephen	On site at Kitchener location. Developed contact list for customers with obsolete tools and sent out a notice. Launched an advertisement with Canadian Metalworking for obsolete tools. Confirmed details with temp agency.	6.5
7/25/2023	Sleeth, Jorden	On-site attendance - prepare for and attend call with TD and counsel re: offers and path forward; update option analysis and circulate to R. English; call with Mary from Zynik; calls to unsuccessful bidders; review revisions to APA and provide comments; call with Rollstamp (status update); insurance call; receiver team call.	5.0

Date	Name	Narrative	Hours
7/25/2023	Damiani, Stefano	Onsite attendance at Kitchener; amend rejection letter, calls and emails with rejected bidders; production meeting; call with J. Thrasher (NFP) re insurance extension; call with Mr. Kay (Windsor Plant Landlord) re rent; draft KERP letter and meet employee; conference call with TD and counsel re sale process; meeting re repairs; review of APA and detailed comments to R. English on same; review obsolete tool notice and listing, instructions to S. Messina canvass plant and instructions to team; review cash flow; review and approve disbursement requests, and instructions to S. McNeil on same; review tool release schedule and email of Engineering Manager on same; execute customer settlement agreement; emails with production customer re new terms.	8.3
7/25/2023	Cestnick, Winston	on site attendance at Kitchener location - updated production schedule for next 2 weeks, calculated resin use estimates, calculated use of resin paid for by specific customers, ran morning production meeting, calls with customers explaining receivership; preparation of customer release agreements	7.8
7/25/2023	Khemani, Bharat	Working on daily cashflow and weekly AR report	4.2
7/25/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables-12; Prepare Deloitte deposit reqs - 4; Email Cavalier a resin acknowledgement for signature to release resin; Email Zena at Livingston regarding more funds on hand needed; TCT Kone Cranes regarding scheduling inspections; Forward email from Nexeo to Ali to cancel resin; Email RS Trust re Grand Valley wire - search for original email to RS Trust - unable to find must have been missed - resent to do wire and send money- emailed W. Cestnick to advise; Go over payments and invoices with Duane and W. van Alphen; Response to Steve Burns regarding ordering for purge resin and boxes; Send court order to Krause regarding old invoices not getting paid; Review and approve try out and production invoices for Lou-Ann and L. Conorton; TCF S. Damiani regarding issues in Kitchener re a machine; Conversation with Duane and W. van Alphen re Darshan Brass - email back and forth with him regarding invoices for 2nd drop off and wire payment - call to W. Cestnick to confirm parts were delivered - will get back to me tomorrow a.m.; Scan, rename and email 12 cheque reqs to S. Damiani for approval; TCF Aubert at Kone Cranes to discuss scheduling something for tomorrow up to Monday or cancel and return money	7.8
7/25/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Various questions from staff; Negotiations with Accucam and follow-up; Meet with CRA regarding data transfer; Call with CRA to allow upload of audit info; Review of expenditures and various approvals; Calls with various customers including Rollstamp; Review and update APA with S. Damiani	9.0

Date	Name	Narrative	Hours
7/26/2023	Conorton, Laura	Processing wire, reports and correspondence with bank; Website updates	5.0
7/26/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference call with Skyjack counsel re settlement agreement; emails with M. Cappabianca re APA amendments; instructions to S. Messina re tool releases; emails with R. English (Aird & Berlis) re APA; emails with S. Bakos (Windsor Warehouse Landlord); emails with M. Lici (Aird & Berlis) re customer agreement, discussion with Engineering Manager re specific tool for sale; emails with M. Lorenti re rent and M. Bottero re construction matters (Kitchener Landlord); review detailed tooling shipment listing and email of Engineering Manager on same; emails with Mr. Kay (Windsor Plant Landlord); telephone and email correspondence with J. Thrasher (NFP) re insurance extension negotiations; call with rejected bidder, arrange return of deposit; CRA audit update; accounts receivable update.	9.5
7/26/2023	Messina, Stephen	On site in Kitchener. Coordinated advertising of obsolete tools and further continued to contact former customers with obsolete tools. Informed short listed buyers we rejected their bid. Gathered support to return the deposits for unsuccessful bidders	5.6
7/26/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, updated staffing schedules, onboarded temp-hired forklift driver, vetted/signed-off on customer tool releases, signed off on outgoing inventory shipments, prepared customer release	8.5
7/26/2023	Sleeth, Jorden	On-site attendance - plant tour; APA review; insurance call, calls to bidders, staffing considerations at Ardelt location; review payments and approve; review customer settlements and approve/execute; circulate updated offer analysis and cover memo to TD; initial review of revised APA.	4.5
7/26/2023	Khemani, Bharat	Working on daily cashflow and weekly AR report	3.1

Date	Name	Narrative	Hours
7/26/2023	O'Neill, Sandi	Travel to Plant 1; Approve shipments going in and out - 5; Review emails from last night; Prepare Deloitte payables- 9; Prepare Deloitte deposit reqs - TCT to City Hall more questions about property taxes - register on line to get tax information - wait for PIN #; Print up approval for cheque reqs - scan and send to RS Trust; TCF Debra - HR to discuss Ali and her Dr's appointment and WSIB form; Meeting with Ali to discuss Dr's note and WSIB form- discuss with W. van Alphen - call Debra to advise to put WSIB form through with denial of claim; Email Harrison Pensa re outstanding bills and ask S. Damiani if paying or waiting for court approval; Email from Krauss re 30 day goods - go see if parts were used or still in package - go talk to Rob Kolody; Meeting with Rob about parts - got very upset - had conversation regarding everyone yelling at him because he can't order parts - tons of parts needed - Duane came into the conversation and then John Robert - heard complaints - offered to have a meeting with everyone to discuss issues; Go talk to Charlie about Krauss parts - bring to W. van Alphen's attention; Scan and email legal bills to S. Damiani for approval by bank; Scan and email Enwin bills to W. van Alphen; Email Sally Bakos - landlord of Plant 2 for July's rent invoice; Review WSIB claim forms sent to WSIB - go over with W. van Alphen and filed away; Go on City of Windsor website and print up information about property - bills, etc. for W. van Alphen and S. Damiani; TCT Kone Cranes - ok to schedule inspections - talk to Rob about getting someone to work the weekend to get the inspections done - get W. van Alphen to approve the overtime; Send email to Pam and Debra-HR re who has access to web sites and social media; Review and approve invoice for tryouts and production for Laura and Lou-Ann; Print paperwork and prepare cheque reqs to Mega Mold and Unique to return bid deposits	8.0
7/26/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review of cashflow, AR roll forward, and deposit requisitions; Review with S. Damiani re Raymond; Review and update APA with S. Damiani; Call with Skyjack and Marble; Call with TD bank and legal counsel; FU with CRA - set audit date; Call with legal counsel(s) and Deloitte regarding updated bids; Review of ERV template and detailed instruction to S. Messina for completion; Various calls with customers, staff issue, and resin/component approvals	8.0
7/27/2023	Conorton, Laura	Processing cheques, wires, recording incoming payments, reports, correspondence with team, urgent cheques, couriers	6.5

Date	Name	Narrative	Hours
7/27/2023	Damiani, Stefano	Onsite attendance at Kitchener; correspondence with Raymond re settlement terms and logistics, call with W. Van Alphen on same; review and execute Amended APA re Windsor sale, emails and call with counsel; on-site meeting with Rollstamp tooling personnel; production meeting; call with S. Moutoux (Plant Manager); emails to K. Kuepher (Skyjack counsel); telephone and email correspondence with T. Hogan (Harrison Pensa); instructions to A. Pandit re WEPPA; review and sign settlement and release agreement, instructions to W. Cestnick; review and approve disbursement requests, sign wires; reporting email to TD; obsolete tools listing.	8.5
7/27/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, met with landlord representative and general contractor to discuss plans and potential interruptions to operations, drafted alternative shipping route options, calls with customers; prepared customer release documents, drafted AR invoices and coordinated payment with customers with outstanding balances	7.9
7/27/2023	Sleeth, Jordan	Onsite attendance - tour facility with Rollstamp attendees, consider Rollstamp exit issues with S. Damiani, review weekend incremental production costs; review revised APA (both to and from buyer), discuss same with R. English, S. Damiani and M. Lafortune; review and approve bid deposit wire transfer returns.	4.2
7/27/2023	Khemani, Bharat	Working on daily cashflow update	0.5
7/27/2023	O'Neill, Sandi	Approve shipments going in and out -3; Review emails from last night; Prepare Deloitte payables- 8; Prepare Deloitte deposit reqs - 7; Email Elite Security to advise of Kone Cranes coming this weekend and Jordan working this weekend - cc Duane, Rob and Scheduling; Do up report for S. Damiani and J. Sleeth on payroll information for Windsor and Kitchener - talk to Debra-HR about numbers; Respond to TMG re what invoices the wire covers; TCF W. van Alphen - looking for deposit in Moldco US account - email RS Trust to send online report and banking info for today; Review order for JaniSafe - talk to Duane - just ordered bags and cleaning supplies - ask Duane to get Brian and Rob to do inventory before ordering anything else; Scan, rename and email wire cheque reqs to S. Damiani for approval; Scan, rename and email JE cheque reqs to RS Trust on Livingston to reallocate funds on hand; Finish and send report re payroll to J. Sleeth and S. Damiani and S. Messina; Prepare deposit reqs for wires and transfers - scan, rename and email to RS Trust, S. Damiani and B. Khemani; Complete three cheque reqs for fees for J. Sleeth - call Laura to discuss - scan and email to Laura and wait for approval from bank; Discuss with Duane about what resins are needed, went over PO's on W. van Alphen's desk for approval tomorrow; Review and approve tryout invoices for Lou-Ann; Email payroll register reports to J. Sleeth, S. Damiani and S. Messina; Approve overtime for payroll; Print up invoices for payments; Meeting with John Robert about ordering nitrogen tanks for jobs coming up - approved	8.0

Date	Name	Narrative	Hours
7/27/2023	van Alphen, Wendy	Calls with S. Messina regarding ERV and obsolete list and disbursement; Call with Skyjack and S. Damiani	1.0
7/28/2023	Cestnick, Winston	on site attendance at Kitchener location - ran morning production meeting, call with customers regarding receivership process and facilitating payment, calls negotiating overstock inventory prices with customers, preparing customer releases, sign shipment	7.8
7/28/2023	Sleeth, Jorden	Onsite attendance - finalize Aarkel APA; call with Rollstamp and continue exit planning analysis and considerations including tours of plant; internal planning calls re: court attendance for SISP approval motion, etc.; court report preparation; review ERV and consider assumptions.	4.8
7/28/2023	Conorton, Laura	Recording receipts, reports, completing wires, filing, trust administration	2.5
7/28/2023	Damiani, Stefano	Correspondence re Skyjack payments; review and approve disbursement requests and wire payments; email correspondence with TD and counsel; emails with Engineering Manager re tagging tools for shipment and sale of mold bases; detailed email of R. Danter (Harrison Pensa), comments on same; e-mails with R. English (Aird & Berlis); production meeting; emails with T. Hogan (Harrison Pensa) and T. Van Klink (BMO counsel) re BMO unit; emails with Mr. Kay (Landlord).	2.7
7/28/2023	Khemani, Bharat	Working on daily cashflow and weekly AR report	3.8
7/28/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Call with Magna re production stoppage; various emails; Group meeting regarding go flow plan and planning re ERV and court reporting; Various call with customers; Meet with Larry Duane; print off signature sheets for finalization of purchase; ERV calculation and preparation review of information; Review payments & purchases	8.0
Total			888.0



Invoice 8003935414

Deloitte Restructuring Inc.

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: September 11, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the
receivership order dated May 26, 2023 for the period July 30, 2023 to
August 26, 2023.

Please see attached appendices.

HST applicable 342,135.00

Expense

Out-of-pocket Expenses:
Accommodations - Hotel 5,493.99
Transportation (e.g. mileage, taxi, public transit, tolls, parking)
6,255.42

HST applicable 11,749.41

Sales Tax

HST at 13.00 % 46,004.97

Total Amount Due (CAD) 399,889.38

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8003935414	399,889.38	Payment for invoice 8003935414

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	50.0	725.00	36,250.00
Keeble, Jeff	Partner	1.1	725.00	797.50
Damiani, Stefano	Director	128.6	605.00	77,803.00
van Alphen, Wendy	Senior Manager - Contractor	143.7	525.00	75,442.50
Khemani, Bharat	Manager	85.6	475.00	40,660.00
Brown, Rose	Manager - Trust Accounting	44.9	350.00	15,715.00
O'Neill, Sandi	Manager - Consultant	134.9	350.00	47,197.50
Messina, Stephen	Senior	22.1	295.00	6,519.50
Cestnick, Winston	Analyst	138.7	250.00	34,675.00
Conorton, Laura	Analyst	28.3	250.00	7,075.00
Total Professional Hours and Fees		777.9		342,135.00
Out-of-pocket Expenses				11,749.41
Accommodations - Hotel			5,493.99	
Transportation (e.g. mileage, taxi, public transit, tolls, parking - detail below)			6,255.42	
Mileage			4,514.25	
Parking			158.34	
Public Transport (Bus, Ferry, Train)			292.95	
Taxi/Rideshare			994.65	
Tolls/Road Charges			295.23	
Total Fees and Expenses (CAD)				353,884.41

Appendix #2
Work performed from July 30, 2023 to August 26, 2023

Date	Name	Narrative	Hours
7/30/2023	Damiani, Stefano	Conference call with D. Humphries (COO) re Kitchener wind-down and Windsor transition; call with L. Delaey (Aarkel) and D. Humphries re employees and closing planning matters; emails with J. Thrasher (NFP) re deal status update and insurance; internal correspondence; review email of D. Macmillan (ITI HR Manager) re ADP reporting for T4's and CRA payroll audit.	2.2
7/30/2023	Sleeth, Jordan	Planning call with L. Delaey (Aarkel), D. Humphries, W. van Alphen, S. Damiani re: employee communications, transition planning; update e-mail memo to receiver team.	2.0
7/30/2023	van Alphen, Wendy	Conference call with Duane; Larry; Stefano; Jordan re announcement; Preparation of ERV.	3.5
7/31/2023	Conorton, Laura	Recording Journal Entries and receipt, reports.	1.7
7/31/2023	Messina, Stephen	On site at Kitchener location. Conducted walk around on site and took note of the obsolete tools on hand and the companies owning them. Contacted all parties with information on the director and began searching for each company's contact information.	7.6
7/31/2023	Messina, Stephen	Began updating the first report for the courts, summarizing key metrics from the SISP.	1.0
7/31/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, calls with customers re receivership and inventory negotiation preparation of release documents, met with customers on site to release molds.	7.9
7/31/2023	Damiani, Stefano	Review and amend settlement agreement re Autosystems; draft employee notice letter re Kitchener, emails with M. Lici (Aird & Berlis) on same; production meeting; banking emails; instructions re WSIB and EHT; email to S. Bakos (Windsor Warehouse Landlord); team meeting; instructions to W. Cestnick re employee matters; emails with customer (GSS) re settlement, instructions to B. Khemani on same; review estimated realizations calculation, comments to W. Van Alphen on same; instructions to S. Messina re equipment lease analysis and lot package; instructions to R. Brown re cashable GIC.	7.9
7/31/2023	Sleeth, Jordan	Onsite attendance - attend production meeting; staff meetings re: SISP communications; attend to Rollstamp onsite attendance and tool removals; priorities meeting with Receiver team; discussion with J. Deutschlander re: CAD drawings and tool removals.	5.7

Date	Name	Narrative	Hours
7/31/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for outstanding AR collections and inventory liquidation.	6.7
7/31/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night - 101 from Friday- review and respond; Prepare Deloitte payables- 17; Prepare Deloitte deposit reqs - 3; Meet with Rob Kolody and KoneCranes regarding crane inspections Friday, Saturday and Sunday; Set up online account with KoneCranes; Respond to Winston's email - looking for wire deposit; Email resin acknowledgement to ABC for signature and release; Review and approve resin acknowledgment for Circle K and Lamko to pick up; Review and approve invoices for tryouts and production to send out for Lou-Ann and Laura; Review bills with Wendy from Friday to pay; Review and approve Kitchener's payroll for Debra-HR Meeting with staff, Duane, Wendy and Larry from Aarkel to announce new owners; Go over PO's with Duane and Wendy; Email Cristian for Moldco PO's to prepare deposit req; Review and approve Windsor's overtime and payroll for Debra-HR Scan, rename and email all payables and deposit reqs to Stefano for approval; Print up logistics to put with payables to show delivery; Print up approval for payables - scan and send everything to RS Trust.	8.3
7/31/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Meetings: resin requirements; FFR call; Autosystems call; Daily recap call; Light Sources meeting; Rollstamp meeting with Jim Walton; AR clean up with Bharat & Cristian; Preparation of ERV; Call with Coltene re payment; Various calls with suppliers & customers; Call with Ed Isaak re lost Raymond payment; Discussions with Alumicast re payment of invoices and supply; Various discussions with Aarkel; Group discussion re progress of release of molds and FG inventory; All IT meeting and announcement of Agreement with Aarkel.	9.8
8/1/2023	Brown, Rose	Trust Banking Admin. - Reconcile GL to Bank, Pull online report and GL's and send to onsite staff, Input Receipts into Ascend and file back up. Review Disbursements.	2.2
8/1/2023	Messina, Stephen	On site at Kitchener location. Facilitated two tool / resin releases at the Kitchener facility, ensuring the correct tools were loaded and photographed. Spoke with several sources on scrap material management at the facility.	7.2
8/1/2023	Conorton, Laura	Preparing 5 wires and 12 cheques for Injection/Moldco, trust administration.	4.7
8/1/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, preparation of customer release documents, calls regarding obsolete tools and scheduling pickup times, signing off on outgoing shipments.	8.5

Date	Name	Narrative	Hours
8/1/2023	Damiani, Stefano	Onsite attendance at Kitchener; conference call with Aird & Berlis re leases, APA, Court motion; call with J. Thrasher (NFP) re insurance extension negotiations; onsite meeting with Rollstamp (Magna), instructions re tools and process; emails with customer re settlement; meeting with Controller re A/R and cash flow; internal correspondence re Magna; meetings with Engineering Manager re tool release plan; instructions to S. Messina re shipping and receiving controls; correspondence re Raymond settlement and production matters; review and approve wires; call and email with S. Bakos (Warehouse Landlord) re sale timing and lease assignment; conference call with Magna management; detailed email to M. Bottero; emails with customers and counsel; voicemail and email correspondence with Mr. Kay (Windsor Plant Landlord); realizations analysis and call with W. Van Alphen on same; prepare detailed cure costs analysis and compendium, email to Aird & Berlis on same.	8.8
8/1/2023	Sleeth, Jordan	Various - insurance call re: coverage given SISP results; call with counsel re: Ardelt landlord construction; attend to Rollstamp onsite issues (tool removal), host group call re: same, debrief with Moldco and Receiver team; ERV review.	4.5
8/1/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for outstanding AR collections and inventory liquidation.	6.5
8/1/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 4; Prepare Deloitte deposit reqs - 3; Print up invoices for payments - review, get approval; AP sent old invoices - 4 companies - send out notice of receiver again and advise not paying; Get address for bank for RS Trust; Print up GFL invoices - review for payment -TCT GFI to confirm; Help Wendy with list - ensure parts are on bills; Email Enwin and Enbridge - advise new owners coming - ask to hold deposits required; Review KoneCranes quote for cranes - disc with Wendy - scan safety risks to Stefano for approval; Work on list for Kitchener employees re termination letters. Compare names from payroll registrar with list from Stefano - email Stefano for approval; Print up logistics - attach to payments; Ask Ali to get wire information for Antek; Email Microsoft for update on address or wire information to make payment; TCF Superior re outstanding invoices - reviewed all paid - emailed 3 invoices - found one already paid - will pay two others.	8.5
8/1/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review & approve payrolls - email to TD re same; Gather information for Rollstamp; meetings re same; Response to IIMED and call set up; Call with Autosystems & next steps; Various review and approval of payments Follow-up with Raymond regarding outstanding cash; Review and update ERV with SD; Various requests from Rollstamp; review and update.	8.7

Date	Name	Narrative	Hours
8/2/2023	Conorton, Laura	Processing cheques, trust administration and filing, processing urgent wire to TMG.	2.5
8/2/2023	Messina, Stephen	Coordination of obsolete tools, calling and emailing companies. Coordinated transition of work prior to vacation.	3.8
8/2/2023	Brown, Rose	Trust Banking Adm - Update Ascend with deposit entries and prepare reconciled GL reports & online banking reports to the team. Telephone call to TD Bank regarding investment rates and prepare update forms for processing investments.	2.1
8/2/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, reviewed Trojan (light sources) account position, call negotiating inventory price and AR payment, preparation of release documents, calls with customers including Masco, Wieland.	8.6
8/2/2023	Damiani, Stefano	Onsite attendance at Kitchener; correspondence and site meetings with Magna re transition; conference call with Mr. Kay (Windsor Plant Landlord), reporting email to M. Pedro (Aird & Berlis) on same, review response; email to Aarkel/Zynik; production meeting; conference call and emails with Weir Foulds (counsel to GSS); conference call with IIMED/NDI re transition; realizations analysis; email and telephone correspondence with Corporate Assets (Auctioneer re Kitchener); review security opinion, detailed comments on same; meetings with tooling manager and production supervisors; review and approve wires and disbursements; correspondence with TMG re critical resin importation, review of customs broker matter; AarKel transition matters with W. Van Alphen; emails with R. Danter (Harrison Pensa); review Corporate Assets APA.	8.8
8/2/2023	Sleeth, Jordan	Review and provide comments on ERV; email memo to Rollstamp re: tool removal scheduling.	0.8
8/2/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for outstanding AR collections and inventory liquidation.	5.8

Date	Name	Narrative	Hours
8/2/2023	O'Neill, Sandi	Approve shipments going in and out - 5; Review emails from last night; Prepare Deloitte payables- 9; Prepare Deloitte deposit reqs - 2; Review payables paid from RS Trust (wires) - print confirmations - date stamp and file; Respond to TMG's email re wire confirmation; Ask Pam to get information from EHT and WSIB; Emergency PO-do up cheq req-scan and email to Stefano for approval - scan to RS Trust; Discuss changes on PO's with Ali - need new proforma; Print up emails re cheques done and being mailed - pull cheq reqs - date stamp and file; Email out 26 notice of plant closure letters to Kitchener staff - TCT Winston to get one more email address or hand out letter to employee; Print up invoices to pay - email Savarin Springs for individual invoices from statement; TCF TMG re getting shipment out; TCT Coxon for invoices - print up for review and payments; TCT Coxon for explanation on one of the invoices	8.4
8/2/2023	van Alphen, Wendy	Daily Raymond call; daily production call; Review & approve payrolls - email to TD re same; Aarkel on site from 9:30 am to 4:30 pm; Various calls with customers regarding continued production; Skyjack call; Autosystems Call; Raymond Call re payment; review & update ERV with SD; Review Alumicast account; resin needs Meeting with Raymond purchasing and finance team; Calls with Broker for release of resin stuck at border (for Rollstamp).	8.8
8/3/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, calls regarding Rollstamp (Magna exit) - internal, call with magna discussing exit plan, preparation of release documents, email correspondence with customers regarding release fees, short run to home depot to retrieve parts needed for operation, updating customer tracking excel documentation, calls with customers informing them of obsolete molds for retrieval.	8.7
8/3/2023	Brown, Rose	Trust Banking Adm - Update Ascend with deposit entries and prepare reconciled GL reports & online banking reports to the team. Issue Disbursement Wires & cheques and prepare for mailing.	3.3
8/3/2023	Damiani, Stefano	Onsite attendance at Kitchener; meetings with Engineering Manager re tool releases, Magna status; emails re delayed resin, customs matter; instructions to Logistics Coordinator; meeting with Magna staff; correspondence with Skyjack re settlement; e-mails with Aarkel/Zynik re Windsor transition matters; call and emails with J. Yantzi (Aird & Berlis); review settlement agreement; emails with counsel; cash management, instructions to B. Khemani on same; instructions to W. Cestnick.	8.5
8/3/2023	Sleeth, Jordan	Review ERV and cover email, revise and circulate to TD.	0.5
8/3/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for outstanding AR collections and inventory liquidation.	4.8

Date	Name	Narrative	Hours
8/3/2023	O'Neill, Sandi	Approve shipments going in and out -0; Review emails from last night; Prepare Deloitte payables- 2; Prepare Deloitte deposit reqs - 0; Dealt with issues with TMG, Livingston and a truck stuck at the border - calls and emails to Zena - ITI's rep - LM TCF TMG - driver stuck at border - emails and calls to Wendy, Winston, Zen and Joanne to get truck released; Redo cheque req as no money in IT US account - TCT; Wendy to discuss - take out of Moldco for now - conference call with Bharat and Wendy to discuss cash flow and wrong info re US accounts; Scan, rename and email cheque reqs to RS Trust for payment - print up approval and send; Print up Accucam bills, review and post date for payment; Print up Rogers bill for Kitchener - TCT Rogers re late payment charge - got removed; TCT TMG - Kelly - advised update status on truck at border; Email Rebecca at MDM re updated statement and ask questions re bill; Go find and pick up box for Krauss parts - email regarding returning them - Stefano emailed re filling out proof of claim to property; Work with Pam on WSIB statements; TCT EHT- conversation with Pam and rep at EHT account under investigation now - will call back; Email to Stefano and Wendy on update with EHT and WSIB; TCF Zena from Livingston to discuss what happened today - sent her email of conversation, new owners, and request balance statement - advised more trucks coming in the next few days; Scan, rename and email cheque reqs to Stefano for approval; TCF Rose - all cheques mailed - one wire sent - emailed confirmation	8.3
8/3/2023	van Alphen, Wendy	Call with Rollstamp re supply; collar A and Alumicast balances; update call with Stefano re same; Various calls with Rollstamp re production; resin on hold; Various calls - Rollstamp; Alumicast; Raymond call re \$; Various emails - calls with Aarkel related to info requirements.	3.9
8/4/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, oversaw Magna (Rollstamp) release and audited items leaving, calls with customers regarding receivership and payments, preparation of release agreements for Rhino, PLP, Cambridge Brass, UCEL, and Lumen.	8.2
8/4/2023	Damiani, Stefano	Telephone call with R. Haas (Corporate Assets), amend agreement and email on same; emails with J. Yantzi (Aird & Berlis) re Corporate Assets ASA; review and amend customer settlement agreements; call with P. Mund (advisor to Landlord); production meeting; call and emails with M. Pedro (Aird & Berlis) re lease assignment; emails re tool releases; call with W. Van Alphen; Aarkel transition matters; review Magna tool listing; discussion with Engineering Manager; review inventory listings from R. Peron; conference call re Magna agreement, review and amend agreement.	6.7

Date	Name	Narrative	Hours
8/4/2023	O'Neill, Sandi	Approve shipments going in and out - 4; Review emails from last night; Prepare Deloitte payables- 0; Prepare Deloitte deposit reqs - 7; Print up invoices for payments; Print up approval to scan for cheque reqs - email; Alumicast to confirm # company prior to paying CRA as third party requirement to pay; Lou-Ann is off today - check on Laura - advise to call if need help with shipments; Pull cheque reqs that were done and mailed out - date stamp and file; Scan, rename and email deposit reqs to RS Trust, Stefano and Bharat; TCT CWB National Leasing to obtain explanation on what the bills are for - email Stefano the explanation for the leasing bills; Email resin acknowledgement to Cavalier for signature; Review email from Formerra re no material available - send email to RS Trust to hold wire until we hear something from Formerra	6.8
8/4/2023	van Alphen, Wendy	Review of plant status; Review of information requirements Rollstamp; Raymond review and update; Discussion with Skyjack; prep release and invoicing for equipment; Release prep for Rollstamp; direction of invoicing resin and packaging.	6.9
8/7/2023	Damiani, Stefano	Review and sign production notice letters, call with W. Van Alphen on same; prepare template form of settlement agreement, email to W. Cestnick on same; emails.	1.6
8/8/2023	Conorton, Laura	Processing wire for Antek and Ineos, trust administration.	1.2
8/8/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Input Receipt/Deposit and file back up. Scan mail rec'd and sent to onsite location.	2.7
8/8/2023	Sleeth, Jorden	Call with S. Damiani re: court report, tool removal, landlord issues, general updates.	0.5
8/8/2023	Damiani, Stefano	Onsite attendance at Kitchener; review customer equipment sale; production meeting; telephone and email correspondence with S. Bakos (Landlord - 2051 Ambassador); Windsor payroll instructions; emails and discussions with Engineering Manager re customer tool releases and sale of mold bases; review email with Mr. Kay, draft response, call with M. Pedro (Aird & Berlis) on same; email to J. Thrasher (NFP) re insurance extension update; review and approve disbursement requests, wire payment; correspondence with Magna; emails with Kitchener Landlord representative (Whitney Realty); instructions to team re Corporate Assets agreement and deposit; Magna agreement; email to M. Pedro re calculation.	8.4
8/8/2023	Khemani, Bharat	Working on daily cashflow update and sending obsolete tools release letters to customers.	3.1

Date	Name	Narrative	Hours
8/8/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, call with Magna Autosystems America re: release process/timing/payment, call with Global Sensor regarding viewership of molds/release process/payment, preparing customer release agreements, calling customers regarding obsolete tools, scheduling staffing for next weeks, auditing payroll numbers and reconciling to schedules, updating production schedule for week.	8.2
8/8/2023	O'Neill, Sandi	Approve shipments going in and out -3; Review emails from the weekend - print up invoice to pay - respond to inquiries; Prepare Deloitte payables- 10; Prepare Deloitte deposit reqs - 4; Deal with issues re Microsoft - no emails going through - cut us off for no payment - have been asking for wire info since June - emails and calls back and forth - got Pam involved to call them and get back on line - spoke to them regarding court order and section 12 - can't refuse service - waiting for wire payment info from billing dept. Got us back up and running through a free trial basis Scan payables for wires to RS Trust to get out ASAP; TCF Rose re PLP and went into wrong account again - email Cristian to get invoice for Rose to be able to transfer the money; Email MDM to follow up on last statement; Email KoneCranes re follow up on quote and ask questions regarding lead time on parts; Scan, rename and email payables for approval to Stefano; Pull cheques and wires sent out, date stamp and file; TCF and email from Debra re payroll - review and approve; Find deposit req for Pam to post	8.2
8/8/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Various customer meetings & calls re discontinuing customers; Raymond meetings - collection; Various customer releases; Magna meeting re scheduling; Send out notices for discontinuation of production to all production customers; Approval of various payments.	8.8
8/9/2023	Conorton, Laura	Processing wires, cheques, correspondence with TD.	2.0
8/9/2023	Sleeth, Jordan	On-site attendance; attend to landlord issues with S. Damiani; ERV review call with TD; planning meeting with Receiver team; tour facility and discuss tool removals with J. Deuschlander.	3.5
8/9/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Input Receipt/Deposit and file back up.	2.8

Date	Name	Narrative	Hours
8/9/2023	Damiani, Stefano	Onsite attendance at Kitchener; detailed email to Mr. Kay (Windsor Landlord) and counsel re tax calculation and lease assignment; meetings with Controller re transition plan, priority tasks, invoicing; conference call with Skyjack re settlement agreement and transition matters; review and amend obsolete tools letters, instructions to B. Khemani on same; emails with customer re invoicing; production meeting; Court Report; review and approve disbursements requests and wire payments, instructions re deposit return; site meeting with Landlord's demolition contractor, email correspondence with M. Bottero (Kitchener Landlord) on same; emails with J. Thrasher (NFP) re insurance status; meetings with Engineering Manager on revised tool release schedule and production matters; email to R. Haas (Corporate Assets); review and amend Autosystems Plymouth agreement.	8.2
8/9/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and sending obsolete tools release letters to customers.	4.2
8/9/2023	Cestnick, Winston	On site attendance at Kitchener location - morning production meeting, met with landlord sales rep regarding drone footage, met with Global Sensors (customers) on viewing their molds/inventory/equipment and negotiating prices, met with controller regarding transition and tasks as he left to new job, prepared customer release agreements, calls with customers to negotiate inventory prices.	8.0
8/9/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 5; Prepare Deloitte deposit reqs - 7; TCF Lois on my way to work to advise she has Covid - discussed staying home - get Brian to come and clean up office - advise staff; Review and approve tryout invoices for Lou-Ann to send out; Go talk to front office and call Wendy re Lois and Covid; Email Alift to follow up on parts for repairs; Scan, rename and email deposit reqs and cheque reqs to RS Trust and Stefano; Review email and paperwork for MDM re payments owing on insured and ASO; Review cheques completed - pull, date stamp and file; Talk to Duane (back from vacation) catch him up - discussed orders needed this week as Lois and Ali are off; Email from Alift - coming this afternoon to start on forklift repairs; Email from Ineos -haven't received payment yet - email; RS Trust for confirmation number - forward same to Ineos to release material; Send text to Debra -HR - ask her to test for Covid before she comes back to work tomorrow as she was with Lois on vacation; Receive email from Stefano re Livingston for Kitchener - send email with court order or receivership and ask to send outstanding invoices to me	6.5
8/9/2023	van Alphen, Wendy	Various meetings; skyjack; auto systems; Cristian; transactions review.	1.7

Date	Name	Narrative	Hours
8/10/2023	Conorton, Laura	Re-processing of wire to Unique Intasco, correspondence with TD.	1.5
8/10/2023	Sleeth, Jordan	Tool removal planning - call with W. van Alphen, Moldco production call, call with Rollstamp.	1.5
8/10/2023	Damiani, Stefano	Onsite attendance at Kitchener; prepare for Magna meeting, discussion with Engineering Manager on same; review and approve Raymond tooling release agreement; amend and execute Skyjack agreement, instructions to Controller re invoicing; conference call with Mr. Kay (Windsor Landlord), E. Weidberg (landlord counsel), and M. Pedro (Aird & Berlis); Court Report; site meeting with M. Bottero (Landlord) and construction manager re truck access route options and timeline; production meeting; conference calls with J. Walton (Magna) and Magna representatives re Rollstamp; conference call with customer re settlement; email correspondence with Autosystems (Magna).	8.9
8/10/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Review Online banking reports and Input Receipt/Deposits and file back up.	3.7
8/10/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for obsolete tools releases.	4.7
8/10/2023	Cestnick, Winston	On site attendance at Kitchener location - morning production meeting, call with Magna (Rollstamp) on exit plan, met with landlord regarding construction plans and strategy to avoid disruptions, met with landlord sales rep regarding property showings, follow-up call with Magna (Rollstamp) on exit plan, call with Bossard management on fees and release process.	7.5
8/10/2023	O'Neill, Sandi	Approve shipments going in and out - 0; Review emails from last night; Prepare Deloitte payables- 5; Prepare Deloitte deposit reqs - 7; Print up invoices for payments; Print up payables paid-pull-date stamp-file; TCF Laura re problem with wire for Unique-Intasco - email Dave at Unique to confirm banking info - received email back with correct wire information - forward to Laura to call TD and redo wire for approval; Text from Debra-HR - she has Covid - TCT her to discuss - home until Monday; Meeting with Dan to get info for Wendy on WX 3070 material - amount needed, number of parts it will make, etc.; Email from Kone Cranes re 14 week lead time on clamps - advised to see what he can do; TCT/TCF Rose re questions on wires and cheques; Meeting with Dan again on PO's needed for material - what's been paid and delivered; TCT Rose re questions on cheque reqs for investments - prepared them all - scan to RS Trust; Meeting with Larry from Aarkel re getting contact name, email and number to forward to payables once we are done here; Meeting with Rob Kolody and Duane re part needed from Krauss	7.5

Date	Name	Narrative	Hours
8/10/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Various customer meetings & calls re discontinuing customers.	3.4
8/11/2023	Damiani, Stefano	Execute Raymond interim agreement, emails on same; Court Report; emails with customers re settlement agreements, shipments; production meeting; banking instructions to R. Brown; emails with counsel; review emails with Autosystems (Magna) counsel, amend and sign agreement; call with I. Pankoff (Magna counsel); call with Audioscan re settlement; instructions to team.	8.5
8/11/2023	Khemani, Bharat	On site at Kitchener plant - Working on daily cashflow update and coordinating with customers for obsolete tools releases.	3.1
8/11/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Prepare/Process, Transfer between accounts, Submit request for investment purchase Disbursement cheque and wires. Discuss investment purchase with SD. Set up investments.	4.8
8/11/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, scheduled and coordinated Magna releases, prepared customer release agreements, call with audioscan management regarding invoice reconciliation and refund requirements, signing off on and approving outgoing shipments.	7.2
8/11/2023	O'Neill, Sandi	Travel to Plant 1; Approve shipments going in and out - 5 - Lou-Ann off today - helped out Laura; Review emails from last night; Prepare Deloitte payables- 4; Prepare Deloitte deposit reqs - 0; Review deposit req for Pam to post into Sage - separate ITI and Moldco - check against list she provided - go over the missing ones with her; Print up invoices - review and file to pay; Meet with Dan to go over PO's and resin needed; Deal with phone issues - network not working at reception - Pam to call Netmonthey came out and fixed problem; Received pro forma from Ineos - do up cheque req; Send email to Lois and Debra re test again for Covid before coming in on Monday; Assist Duane with PO's for material; Scan and send cheque reqs for approval and then for processing; Respond to Rogers with Pam re ignore cancelling lines - new owners will decide; Scan and email Wendy Alumicast invoices	7.0
8/11/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Call with Mayco; Call with Magna; Various emails & calls to customers; Prep R&D information; review of CF entries for support of R&D information; Preparation of Alumicast payment schedule; Review of customer releases; Assist with preparation of R&D; Review of CF an allocations; Review of AR continuity and allocations.	7.7
8/12/2023	Damiani, Stefano	Drafting of Court Report, review and compile information; review inventory report.	5.7

Date	Name	Narrative	Hours
8/12/2023	van Alphen, Wendy	Preparation of R&D for court report.	3.8
8/13/2023	Sleeth, Jordan	Review draft First Receiver report, provide edits and comments to S. Damiani.	2.0
8/13/2023	Damiani, Stefano	Update Court Report, review and amend R&D; emails with W. Van Alphen; email to counsel.	4.1
8/13/2023	van Alphen, Wendy	Court report review; Update & reclass CF categories; Update ERV.	4.4
8/14/2023	Messina, Stephen	Providing email responses to customers with obsolete tools, booking of hotel for staff.	2.5
8/14/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Prepare/Process, Transfer between accounts and wires and cheques. Obtain wire confirmations from TD Bank and send to onsite staff. Scan Mail rec'd and send to onsite staff.	4.1
8/14/2023	Sleeth, Jordan	Onsite attendance - tour facility; review Rollstamp removals and interim settlement agreements, circulate same to Rollstamp; internal call re: production and tool removal priorities; review R&D and discuss same with B. Khemani;	3.3
8/14/2023	Sleeth, Jordan	Court report - review updated report and QA comments, discuss same with S. Damiani.	1.5
8/14/2023	Damiani, Stefano	Update call with J. Thrasher (NFP) re temporary insurance extension, resubmission; Court Report, emails with counsel on same; emails with R. Danter (Harrison Pensa) re customer matter; e-mail correspondence with customer (NDI) re final production and transition; review and approve disbursements, wire payments; review and sign IDL agreement; instructions re final resin purchases; call with T. Hogan (Harrison Pensa); prepare confidential appendices and bid charts.	7.9
8/14/2023	Khemani, Bharat	On site at Kitchener unit - Coordination with customers to release obsolete tools/molds. And working on R&D for court report.	4.1
8/14/2023	Keeble, Jeff	QAR receiver's report and provide comments and changes.	1.1
8/14/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations and release meeting, updated tool release schedule, call with IIMED regarding release and payment, preparation of customer release documents, signing off on outgoing shipments, customer calls	7.7

Date	Name	Narrative	Hours
8/14/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Various customer meetings & calls re discontinuing customers; Review and update TD for transfers of payroll account and amounts; Various customer releases; Magna meeting re old resin and purchase of same; Meeting re Court report for R&D; Approval of various payments; Prep documentation required for payroll audit - auditors attendance.	8.9
8/14/2023	O'Neill, Sandi	Travel to Plant; Approve shipments going in and out - 0; Review emails from the weekend; Prepare Deloitte payables-5; Prepare Deloitte deposit reqs - Print up invoices - sign into Enbridge to get invoice; Meeting with Lois and Debra - back to work from Covid - tested negative; Review Alift work orders and repairs - still waiting for 1 more to be fixed - scan certificates of completed inspection to Wendy to send to Larry from Aarkel; TCF Linda Hill from Superior Propane - Moldco - questions re proof of claim to be filed; explained process - will send email of process for her manager; Catch up with Wendy from Wednesday; Approve overtime - change in Pam's hours; Review expenses for payroll - go over with Wendy for approval; Print wire confirmations, pull cheque reqs - date stamp and file; Get info/invoices re Raymond to do up deposit req - send email to Winston and Bharat to send invoices; F/U on MDM - send another email requesting new bill to pay; Send f/u email to Krauss re their 30 day goods; Review Windsor payroll- questions to Debra re hours; Review Kitchener payroll - questions to Debra re hours and staff	7.8
8/15/2023	Conorton, Laura	Processing wires, filing, inputting cheques, online web banking, tracking deposits, correspondence with TD and team.	5.5
8/15/2023	Brown, Rose	Banking Adm-Pull online reports & reconcile to Ascend-sent to team, Discuss investment with LC, Cash out 2 investments, Prepare TSF between accts & sent to TD Bank. Update GL with any Receipts rec'd. Review GL's \$10,838 Disb., Scan and save Rec & Disb backup	3.5
8/15/2023	Sleeth, Jordan	Onsite attendance - discuss Rollstamp removals with W. Cestnick and W. van Alphen; review First Receiver report, amend and finalize.	4.6
8/15/2023	Damiani, Stefano	Onsite attendance at Kitchener; production meeting; onsite meeting with customer re tool release; emails with customers, instructions to W. Cestnick and B. Khemani on same; finalize Court Report and motion materials with counsel; call with S. Bakos (Windsor Warehouse Landlord); calls and emails with T. Hogan (Harrison Pensa); update call and emails with J. Thrasher (NFP) re insurance extension to September 5, 2023; emails with R. Haas (Corporate Assets) re preparing machines for auction; review and approve operating disbursements; transition call with team re winddown in Kitchener; CRA audit update.	8.6

Date	Name	Narrative	Hours
8/15/2023	Khemani, Bharat	On site at Kitchener unit - Coordination with customers to release obsolete tools/molds. And working on daily cashflow.	4.1
8/15/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, preparing customer release documents, preparing and reconciling internal invoices, calls with customers regarding release process and scheduling.	8.1
8/15/2023	van Alphen, Wendy	Attend with payroll auditors - review of information with auditors; related discussions on transfer of Moldco; credit transfer to ITI; Update of CF; Prep for CRA auditors return on Aug 17, 2023; Various calls, emails and discussions with customers; Various releases to customers; Review of AR for customer collections; Reconciliation of Moldco payroll ledgers (manual) and combine with ITI 3 months on ADP and reconcile to T\$ summary; Reallocation of -ee deductions and reconcile to split between Moldco to ITI in order to prove the transfer should be completed by CRA.	10.3
8/15/2023	O'Neill, Sandi	Approve shipments going in and out - 5; Review emails from last night; Prepare Deloitte payables- 10; Prepare Deloitte deposit reqs - 2; Print up invoices/mail from Rose at Deloitte; Catch up with Ali re PO's, invoices, etc while she was on vacation; Look for information on wire for Wendy not on GL; Review payables, PO's for supplies; Take Wendy's computer to Plant 2 for CRA audit; Work with Pam/Lois to print up invoices from IQMS for deposit req; Scan, rename and email cheque reqs to Stefano for approval - get approval back and send to RS Trust for preparation; Look into problems with wire from IDL - email RS Trust, email back to IDL, forward emails, etc.; Work on huge deposit req from Raymond - lots of invoices; Review cheque req from Bharat - scanned and sent him the third bill for legal fees	7.4
8/16/2023	Conorton, Laura	Processing wires, producing cheques, correspondence with TD, coordination of transactions, reviewing transaction setups/wire information, website updates, trust administration and filing.	5.2
8/16/2023	Brown, Rose	Pull online report/Ascend report - reconcile to Ascend and send to Team. Send copies of wire confirmation and transfer between account send to team. Scan and save Receipts and disbursement and file.	1.5
8/16/2023	Sleeth, Jorden	Email memo to J. Deutschlander re: Magna and other tool removals.	0.4

Date	Name	Narrative	Hours
8/16/2023	Damiani, Stefano	Onsite attendance at Kitchener; meeting with Corporate Assets onsite re timeline and preparation for auction; production meeting; instructions to Plant Manager re winddown and staffing plan; call with R. Danter (Harrison Pensa); meeting with customer; call and emails with M. Bottero (Kitchener Landlord); review customer settlements; instructions re tool releases; details emails to M. Pedro (Aird & Berlis) re Landlord consent forms; prepare amended cure cost calculation; meeting with the Controller, review updated A/R; call re CRA audit and additional documentation.	8.8
8/16/2023	Khemani, Bharat	On site at Kitchener unit - Coordination with customers to release obsolete tools/molds.	6.1
8/16/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, oversaw outgoing shipments/loading, met with corporate assets representatives regarding tour/items available for sale/process, prepared customer release documents, call with counsel regarding Bossard molds held on site.	8.2
8/16/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 1; Prepare Deloitte deposit reqs - 4; Print up invoices; Scan and send HST filings from CRA for ITI and Moldco to Stefano and Bharat; Deal with issue with Livingston - truck held at border - TCT and emails to anyone I can find at Livingston - both offices to get released; Get Lois to print up credit memos for deposits from Raymond; TCF Zena at Livingston - sent back up to do cheque reqs - got truck released - do up wire cheque req for \$10,000 to wire to Livingston for funds on hand; Help Wendy with requisitions for cashflow; Emails from Rob Kolody re cell phone bills - redo expense sheet - paying for June, July and August only part of bill	5.8
8/17/2023	Conorton, Laura	Completion and filing of processed wires, processing deposits, reports for team, correspondence re wire transaction, reviewing journal entries.	3.5
8/17/2023	Sleeth, Jorden	Rollstamp - call with J. Walton re: tool removal and settlement, email memo to Receiver team, call with J. Deutschlander re: same; call with W. van Alphen and S. Damiani re: production termination, tool removals, WSIB claim, CRA, staffing; call with J. Yantzi re: tool assignment notices on Aarkel transaction.	2.4
8/17/2023	Khemani, Bharat	On site at Kitchener unit - Coordination with customers to release obsolete tools/molds.	3.8
8/17/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, prepared customer release documents, calls with active customers regarding tool release, call with Magna Rollstamp representative on residual inventory and price negotiation.	7.7

Date	Name	Narrative	Hours
8/17/2023	Damiani, Stefano	Email to M. Cappabianca (Aird & Berlis) re sale of A/R; production meeting; call re tooling; instructions to W. Cestnick re construction and access route for Kitchener premises, emails with contractor on same; call and emails with R. Danter; emails with Skyjack; correspondence with Magna; review Skyjack draft agreement and mold listing, review email of Engineering Manager on same; conference call with Aird & Berlis re closing matters; customer settlement agreements; calls with W. Van Alphen; emails with Controller; review updated A/R.	2.3
8/17/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 5; Prepare Deloitte deposit reqs - 1; Scan, rename and email all deposit reqs to RS Trust and Stefano; Go over deposit reqs with Pam to post; TCT Winston for info on deposit to Moldco; Meeting with Larry and Julie -HR from Aarkel regarding transition - questions on payables, etc.; TCF Debra-HR re Kitchener bonuses, questions regarding email from Steve Moutoux; Work on Livingston's account - review what Zena sent and produce cheque reqs to reduce funds on hand - try and find invoices - talk to Lou- Ann and Pam; Put together payables for Wendy to approve; Review Cascades invoices - some duplicate - ask Ali to look into	5.6
8/18/2023	Khemani, Bharat	Coordination with customers to release obsolete tools/molds.	3.9
8/18/2023	Conorton, Laura	Reports and online banking inquiries.	0.5
8/18/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, compiled customer requests to list format, responded to customer requests and inquiries, calls with customers regarding tool release process and scheduling, negotiated inventory pricing with customers, prepared customer release documents.	7.5
8/18/2023	Damiani, Stefano	Conference call with Skyjack; production meeting; call with W. Van Alphen re customer agreements and inventory; emails and calls re customer matter; confirm staffing schedule; calls and emails with R. Danter (Harrison Pensa); (emails with P. De Sousa (IMD/NDI) re final release and schedule for tool release; emails with counsel re landlord matters; review emails with Rollstamp re shipping, instructions to W. Cestnick re quantities; correspondence with Controller; review updated A/R listings; correspondence re Kitchener landlord construction access; review correspondence from creditor counsel (Cunningham) and Harrison Pensa.	2.2

Date	Name	Narrative	Hours
8/18/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Meeting with CRA to: -review of moldco calcs as proof that credit of \$880K should be made and transferred to ITI; -review of structure to prove Moldco and ITI are related; Meeting with Airds to review Receiver concerns over transfer of tools to Aarkel and prep of notice to protect receiver; Review and update meeting with Stefano and Jorden re ongoing production; CRA update; WSIB claim; Raymond; AR collections.	9.2
8/19/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Various email exchange with Skyjack; Call with staff for updates and direction on final production shipments; Respond to Larry's emails & questions; Contact with Hr regarding T4s from January 1 to May 25, 2025; Review of lease agreement and payment of same; Review of CF an allocations; Review of AR continuity and allocations; Preparation of EDC vs. AR schedules and update on realizations for Stefano; Discussions and direction to Cristian re final invoicing.	7.5
8/21/2023	Damiani, Stefano	Review email of I. Pankoff (Magna legal counsel); production meeting; emails with Rollstamp and staff re shipping; emails with Aird & Berlis and Aarkel counsel; call with Tooling Manager; call with W. Van Alphen re remaining releases, inventory; emails re Windsor inventory purchases; review and approve disbursement requests; review amended form of Landlord consent, comments to M. Pedro (Aird & Berlis) on same; review and approve disbursement requests; email to AarKel re insurance; emails with Mr. Kay (Landlord re 4350 Industrial); emails with Marble Electronics re status of payment; instructions to S. O'Neil; review payroll; Kitchener staff meeting; emails with M. Pedro (Aird & Berlis) re landlords; emails with S. Bakos (Windsor Warehouse Landlord); emails with customer (NDI) re final release; conference call with J. Thrasher (NFP) re insurance.	4.9
8/21/2023	Sleeth, Jorden	Misc - review emails re: Magna/Rollstamp production, receiver update from counsel re: landlord assignments.	0.5
8/21/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Call with Jim Walton; Discussion with Peter - IIMED; Discussion with Windsor Modules; Review and approval of payroll; Discussions with Larry - Aarkel; Discussions with Stefano.	9.3

Date	Name	Narrative	Hours
8/21/2023	O'Neill, Sandi	<p>Approve shipments going in and out - 0; Review emails from Friday - 96 - print invoices - review and respond to emails; Prepare Deloitte payables- 11; Prepare Deloitte deposit reqs - 0; Catch up meeting with Duane from Friday; Approve overtime for scheduling; TCF John Robert re opening shop on Saturday to complete a job - went down to his office to discuss - decided no - job can be done on September 7 instead; TCF Wendy - scan 3 PO's for material - look up packing slips and info when last shipment received and send to her for approval - she wants to email Larry from Aarkel; TCF Debra-HR re emails from Jeff in Kitchener re expense cheque and hours worked; forwarded email to Wendy, Stefano and Jorden for approval - came back no-not replacing stale dated expense cheque - let Debra know to advise Jeff; TCF John Robert - Collin off this week - finding someone to replace him re picture taking and texting me; Go over invoices an PO's with Ali and Lois - get clarification on some; Scan, rename and email all cheque reqs to Stefano for approval; TCF John Robert - Dave Jr will be filling in for Collin this week on afternoons - Dave sent text for confirmation; Print and review payroll - TCT Debra with questions - TCT; Wendy to have her look at it and approve - reminder to send TD bank info.</p>	6.8
8/22/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Wires/Cheques, Input JE for Livingston and general admin.	3.9
8/22/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning production meeting, coordinated outgoing tool releases, signed off on outgoing tool releases to Geosmart, facilitated Colt toll viewing, Deloitte internal operations and sale process update call.	3.7
8/22/2023	Khemani, Bharat	On site at Kitchener plant - Working on coordinating with customer tool releases and updating daily cashflows.	5.1
8/22/2023	Sleeth, Jorden	Call with Receiver team re: status updates re: sale transactions, production, equipment returns and customer exit agreements; consider Aarkel closing issues (Rollstamp, w/c adjustment and AR sale); call with M. Lafortune.	2.7
8/22/2023	Damiani, Stefano	Emails with R. Danter (Harrison Pensa) re customer matter; review and amend draft agreement with customer, discussion with W. Van Alphen on same; emails re Magna shipments; review and sign customer agreement, instructions to B. Khemani; review and approve disbursements, sign wires; correspondence with the Tooling Manager; team update call; email to Mr. Kay (Windsor Plant Landlord); emails with T. Hogan (Harrison Pensa); review Skyjack credit note.	4.8

Date	Name	Narrative	Hours
8/22/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Call with Jim Walton; Discussion with Peter - IIMED; Discussion with Windsor Modules; Review and approval of payroll; Discussions with Larry - Aarkel; Discussions with Stefano.	8.8
8/22/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night; Prepare Deloitte payables- 10; Prepare Deloitte deposit reqs - 2; Print up invoices and logistics to put with payables; Review logistics from Premier Plastics - shor shipped - talk to Ali about getting money back or ship rest of material; Email resin acknowledgment to Aarkel and Absolute Tool to release resin; Receive resin acknowledgment back - resend with further instructions; Get invoices from Lou-Ann for deposit - do up deposit req; Assist Wendy with updating cashflow - find cheques on Ascend GL - provide invoice number and net amounts and hst; Email Rose for information on a transfer in bank account; Review email from Span Medical regarding receivership and tools in Kitchener - reply and forward to Bharat; Print invoices to pay and confirm hours for forklift driver with Kitchener; Send email to Krauss for response on parts - advise need to hear by Aug 25th; Send email to Advance Composite re credit still on our account - request money back again; Staff meeting with Deloitte - catch up with Jordan; Review and go over KoneCranes PO's with Ali - ask for more info - reduce pricing - new quote; Email Enwin for water arrear for both Plants to pay	8.4
8/23/2023	Khemani, Bharat	On site at Kitchener plant - Working on coordinating with customer tool releases and updating daily cashflows for capturing the correct HST paid/ collected post receivership.	6.7
8/23/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning staff meeting, met with customer Dyer Products to view tools and inventory on hand, met with landlord real estate representatives regarding space tours, signed off on outgoing molds, prepared release agreements.	7.9
8/23/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Wires/Cheques.	3.8
8/23/2023	Damiani, Stefano	Email correspondence; staffing meeting.	0.8
8/23/2023	Sleeth, Jordan	Onsite attendance - attend production meeting, review status of customer tool returns and settlement agreements; review landlord assignments.	2.3
8/23/2023	van Alphen, Wendy	Various calls with customers and DT staff.	1.9

Date	Name	Narrative	Hours
8/23/2023	O'Neill, Sandi	Approve shipments going in and out - 0; Review emails from last night; Prepare Deloitte payables- 17; Prepare Deloitte deposit reqs - 1; Print up invoices and logistics to put with payables; Review invoices and prep for payments; Respond to Winston regarding \$20 test into ITI USD account; Print wire confirmations - attach to cheque reqs -forward to Ali and Duane to send out for material; TCT Alpesh at Tulso re questions about ordering parts from Moldco; TCT Lorraine at Superior Propane re missing invoices and question the statement and late charges to be removed; TCT MNSI re past due statement - discussion on July statements - missed receiving May to June's statement - emailing copies for payment; TCT Wendy to clarify instructions for ADP; TCT/TCF ADP and Debra - discussion on setting up new accounts - things that can't be done by ADP, easiest thing to do - will get sale rep to call Debra; TCF Microsoft with Pam - trying to straighten out balance owing, payment method, etc. - will call back tomorrow with number, etc.; Pull cheques that were sent out today, date stamp cheque reqs paid and file	7.9
8/24/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Wires/Cheques.	2.8
8/24/2023	Khemani, Bharat	On site at Kitchener plant - Working on coordinating with customer tool releases and updating daily cashflows for capturing the correct HST paid/ collected post receivership.	6.7
8/24/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, met with ministry of environment representative regarding waste disposal, prepared customer release agreements, signed off on and audited outgoing shipments.	7.8
8/24/2023	Sleeth, Jordan	On site attendance - attend production meeting and confirm toll removal priorities; tour plant with Corporate Assets, discuss assets to sell, exit timeline; meeting with Clek CEO re: lease assignment; review Windsor lease assignment; payment approvals; call with Aarkel CEO re: Windsor forklifts, Rollstamp exit planning; review Aarkel employment letters and final forms of lease assignments and provide comments to A&B.	6.1
8/24/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Various releases to customers; Calls with Skyjack; Call with Raymond; Review of expenditures and approval; Discussions with Windsor Modules; release and payment.	7.8

Date	Name	Narrative	Hours
8/24/2023	O'Neill, Sandi	Approve shipments going in and out - 0; Review emails from last night; Prepare Deloitte payables- 2; Prepare Deloitte deposit reqs - 0; Print up invoices and logistics to put with payables; Review invoices and prep for payments, mark received and file; Review email re EDC Insurance overdue from Aug 1 - discuss and review with Wendy, get invoices from Pam, do up wires, scan and email to Jorden for approval, send to RS Trust for payment; Scan, rename and email 19 cheque reqs to Jorden for approval - answer questions he had, get approval back, send to RS Trust for processing; Email Elite Security to advise service no longer needed after September 5/23; Emails back and forth with Jorden re staff vacation and sick days - set up call with Debra to answer questions re employee letter from Aarkel re benefits, pay, etc.; Print up NFP invoices - review and prep to pay; Print up rent invoices - review - send back for changes	7.7
8/25/2023	Khemani, Bharat	On site at Kitchener plant - Working on coordinating with customer tool releases and updating daily cashflows for capturing the correct HST paid/ collected post receivership.	6.2
8/25/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, coordinated the release of customer tools to Autosystems Belleville and Skyjack, signed off on outgoing shipments, phone discussions with customers negotiating inventory and releases, prepared customer release documents.	7.3
8/25/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Wires/Cheques.	3.7
8/25/2023	Sleeth, Jorden	On site attendance - prepare for and attend court hearing, review revisions to court order; production meeting; liaise with Rollstamp re: damaged tool; calls with W. van Alphen re: tool returns, damaged tool; tour Kitchener facility; issues review and planning call with S. Damiani and W. van Alphen; Aarkel closing considerations; invoice review and approvals.	5.2
8/25/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Various email exchange with Skyjack; Discussion with Production staff_Jim Walton re magna tool; Respond to Larry's emails & questions; Preparation and review of releases; Review of lease agreement and payment of same; Assist Bharat with CF classifications; Prep of AR to Aarkel; Catch up with Stefano and Jorden re OS list.	8.6

Date	Name	Narrative	Hours
8/25/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night; Prepare Deloitte payables- 15; Prepare Deloitte deposit reqs - 7; Print up invoices and logistics to put with payables; Review invoices and prep for payments, mark received and file; Work with Laura - Windsor Modules picking up tools - 2; truck being loaded - help with pictures, printout of tools; Scan, rename and email deposit reqs to RS Trust; Review payables-prepare requisitions; TCF Rose - Snap On wire was returned from the bank - she is looking into it- advise Duane to advise them; TCF Bharat - help him find cheque reqs on the server - email Rose for assistance; Scan, rename and email cheque reqs for approval; TCF Bharat - help him find cheque reqs on the server	8.0
Total			777.9



Invoice 8004058349

Deloitte Restructuring Inc.

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: October 19, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1000870419TQ0002

For professional services rendered

Fees

Administration of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the
receivership order dated May 26, 2023 for the period August 27, 2023 to
September 30, 2023.

Please see attached appendices.

HST applicable 219,186.50

Expense

Out-of-pocket Expenses:

- Accommodations - Hotel 5,241.50

- Transportation (e.g. mileage, taxi, public transit, tolls, parking -
detail below) 3,755.97

HST applicable 8,997.47

Sales Tax

HST at 13.00 % 29,663.92

Total Amount Due (CAD) 257,847.89

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8004058349	257,847.89	Payment for invoice 8004058349

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	56.0	725.00	40,600.00
van Alphen, Wendy	Senior Manager - Contractor	61.7	525.00	32,392.50
Khemani, Bharat	Manager	27.0	475.00	12,825.00
Brown, Rose	Manager - Trust Accounting	33.2	350.00	11,620.00
O'Neill, Sandi	Manager - Consultant	138.7	350.00	48,527.50
Messina, Stephen	Senior	137.7	295.00	40,621.50
Cestnick, Winston	Analyst	104.2	250.00	26,050.00
Conorton, Laura	Analyst	26.2	250.00	6,550.00
Total Professional Hours and Fees		584.7		219,186.50
Out-of-pocket Expenses				8,997.47
Accommodations - Hotel			5,241.50	
Transportation (e.g. mileage, taxi, public transit, tolls, parking - detail below)			3,755.97	
Mileage			2,345.04	
Parking			25.50	
Public Transport (Bus, Ferry, Train)			442.36	
Taxi/Rideshare			792.70	
Tolls/Road Charges			150.37	
Total Fees and Expenses (CAD)				228,183.97

Appendix #2

Work performed from August 27, 2023 to September 30, 2023

Date	Name	Narrative	Hours
8/28/2023	Cestnick, Winston	On-site attendance at Kitchener location - ran morning operations meeting, met with Wieland electric (customer) to view their tools, compiled shipping documents and oversaw outgoing shipments of molds for RWDI and Global sensors, internal Deloitte meeting, continued from last comment - met with landlord construction crew regarding scrapping material, compiled information and prepared rollstamp (magna) release agreement, calls with customers negotiating inventory purchases.	6.7
8/28/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Wires/Cheques, and input deposit information rec'd.	3.2
8/28/2023	Khemani, Bharat	On site at Kitchener unit - Updating daily cash numbers and following up with customers for obsolete tool releases.	5.9
8/28/2023	Sleeth, Jordan	Payment approvals; team planning call re: weekly priorities; emails to AarKel re: Rollstamp production communications.	2.2
8/28/2023	O'Neill, Sandi	Approve shipments going in and out - 1; Review emails from last night; Prepare Deloitte payables- 5; Prepare Deloitte deposit reqs -2; Print up invoices and logistics to put with payables statement prior to Forward email to Bharat re cheque reqs; Pull payables paid, date stamp and file - 17; Print invoices for remittance advice to prep for deposit slips; Discuss with Ali invoices from JaniSafe and Fastenall; Meeting call with Deloitte staff re plans for this week - Kitchener staff and Windsor transition, etc.; Approve overtime; Review Windsor payroll - call Debra re questions on Archie and WSIB; Talk to Pam re Intact and NFP insurance for October 2023 to October 2024; Talk to Ali re PO's for shop supplies - asked for inventory and how long supplies will last - cut order in half - approve PO; TCF/TCT and texts with Debra-HR - questions on Windsor and Kitchener payroll - get list from Winston - review Kitchener payroll - advise to make changes, KERP and bonuses; Create list of things to discuss with Larry Aarkel at tomorrow's meeting re transition; Email resin acknowledgement to Superior Mold for release of resin.	7.7

Date	Name	Narrative	Hours
8/28/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Purchasing meeting; approval of resins; Discussion with Larry, approval of resin purchase and agreement for repayment; Review of cash receipts and request for transfers from Company accounts to Receivers account; Customer tool lease reviews (3); Review and approval of payroll; Prep of releases for Hematite and Laydon (Windsor); Update meeting with team (Deloitte); Discussion with Duane re: remaining tooling in Windsor; Discussion with Pam regarding records on site for ITI pending closing; Review of AR balances with Deloitte team; Raymond release; Discussion with team re WSIB and potential refund	8.3
8/29/2023	Conorton, Laura	Processing wire payment for Inject US account, recording deposits, trust administration	1.2
8/29/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare Disbursement Cheques, and input Deposits, Scan and save Documents on Q Drive.	4.4
8/29/2023	Cestnick, Winston	Ran morning production meeting, call with Pi Manufacturing confirming their scrapping of tools, coordinating tool release and shipping of IDL displays tools, preparing final release agreement for Rollstamp (Magna), preparing employee termination letters, continued from last note - call with Meltech regarding scrap on hand and payment, follow-up emails with customers regarding deadlines for getting their molds out.	6.5
8/29/2023	Messina, Stephen	Assisted with tool releases including the organization and documentation of obsolete tools. Drafted tool releases.	5.7
8/29/2023	Khemani, Bharat	On site at Kitchener unit - Updating daily cash numbers and following up with customers for obsolete tool releases.	4.5
8/29/2023	Sleeth, Jordan	Onsite attendance - call with Duane Humphries and W. Van Alphen and Aarkel re: Aarkel transition planning; payment approvals; calls with Imran Hafeez of Rollstamp re: KW tours, discontinuation notice and settlement agreement; update discontinuation notice letter; facility tour and discussions with S. Montoux re: equipment status (Machine 23); lease assignments - circulate proof of cure costs payments to landlords; review and circulate employee termination letter; circulate draft AR/Inv agreement to Aarkel, update email re: same to R. English	6.8

Date	Name	Narrative	Hours
8/29/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 10; Prepare Deloitte deposit reqs -3; Print up invoices and logistics to put with payables; Scan and email cheque reqs for approval; Pull payables paid, date stamp and file; Email KoneCranes wire confirmation and ask to schedule repairs; Email Lino - Accucast copy of third party cheque to CRA; TCT Rose re explanation for wire credit - snap on tool - forward to Bharat; Pull payables paid, date stamp and file; Meeting with Aarkel, Duane - new structure, transition; Call with Jorden re RS Trust and advise him of details of Aarkel meeting; TCT James at Meltech re scrap vs. garbage; Email Elite security re leaving keys with Duane upon completion of duties; Email Brian Dales at Aarkel rent invoices for Aarkel; Meeting with Jorden, Duane, Larry to discuss inquiries from transition meeting; call to Lois for credit memo for Moldco invoices; Sca deposit reqs to RS Trust; Call to Bharat re transfer of money from TD to Trust accounts.	7.3
8/30/2023	Conorton, Laura	Reports, processing wire payment to DRI, correspondence with bank and S. O'Neill on returned wire and wire details for JP Morgan, re-issuing cheque and arranging courier, recording receipts	2.5
8/30/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, planning required staffing for future weeks, updated employee termination letters, reached out to customers regarding mold releases, prepared customer release documents	7.1
8/30/2023	Messina, Stephen	On site at Kitchener location. Assisted with tool releases including the organization and documentation of obsolete tools. Communicated with potential metal scrapping companies to determine solutions for excess molds.	5.9
8/30/2023	Khemani, Bharat	On site at Kitchener unit - Updating daily cash numbers to reflect accurate HST numbers since post-receivership period and following up with customers for obsolete tool releases.	5.7
8/30/2023	Sleeth, Jorden	Call with W. Cestnick and W. Van Alphen re: Rollstamp release agreement, tool settlements with other customers; payment approvals; finalize and circulate production discontinuation notice to Rollstamp.	1.8

Date	Name	Narrative	Hours
8/30/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 3; Prepare Deloitte deposit reqs -5; Print up invoices and logistics to put with payables; Work with Debra-HR to get employee list, address and emails to prep termination; temporary retention letters - get word copy of letter; Mail merge letter with employee list, print and make copies; Meeting with Debra-HR to hand out letters and get signatures on copies; Email term letters to those off today or on vacation - send out read receipt; Text on employee term letter - no email; Review email from Jorde re cheque req for D. Kay; Investment - change GL code; TCF and email from Laura RS Trust re Snap On Tool wire - not going through - email Snap On and talk to Duane re getting mail and/or courier info - received wire back in bank - do up revised cheque req - scan and send lawyer to courier cheque; Print up more invoices - review with Wendy - go over; Accucam invoices to pay.	7.5
8/30/2023	van Alphen, Wendy	Daily Raymond call; Daily production meeting; Call to CRA for update; Review of various settlement agreements; Review of termination letters (Windsor) and direction therein; Direction for count of on hand molds and fixtures; Send out "Letters to customers re:- third party tooling: for all customers with tools remaining on floor; Discussions with customers regarding end of production; Discussions with customers re: payment; Approval of payments - CR; Call to CRA for update on audit	7.7
8/31/2023	Conorton, Laura	Reports, processing cheques and wires	3.8
8/31/2023	Cestnick, Winston	Calls with customer Bossard/delivery service/Kitchener and Windsor staff coordinating pickup of their molds, emailing customers consolidating details for customer releases, phone calls with customers discussing info needed and scheduling tool pickups	4.4
8/31/2023	Messina, Stephen	On site at Kitchener location. Assisted with tool releases including the organization and documentation of obsolete tools. Communicated with potential metal scrapping companies to determine solutions for excess molds.	7.8
8/31/2023	Khemani, Bharat	On site at Kitchener unit - Updating daily cash numbers to reflect accurate HST numbers since post-receivership period and following up with customers for obsolete tool releases.	5.5
8/31/2023	Sleeth, Jorden	Onsite attendance - payment approvals, review AarKel cutoff considerations; email memo to T. Hogan re: 3rd party obsolete tools approach, 965 Wilson lease assignment, call re: same: review 41 Ardelt lease invoice from landlord and liaise with landlord re: same; tour facility re: tool release progress, various discussions with KW staff, discussions with Raz from Corporate Assets.	4.5

Date	Name	Narrative	Hours
8/31/2023	O'Neill, Sandi	Approve shipments going in and out - 2; Review emails from last night; Prepare Deloitte payables- 13; Prepare Deloitte deposit reqs - 10; Print up invoices and logistics to put with payables; Email Enwin Utilities for final readings for Deloitte; Meeting with Pamm and Lois re inventory and packing up files - call to Wendy for instructions; TCF Winston re truck coming to pick up mold for Bossard in Windsor - advise Laura and John Robert - spoke to Dan to get information; Scan, rename and email cheque reqs for approval; Scan, rename and email deposit reqs to RS Trust; Email copy of receivership court order to snow removal company for invoices prior to receivership and advise not getting paid; Meeting with Pam to go over AP list - prep email to send out to have invoices go to Pam; Pull payables, date stamp and file; Advise Ali to change PO template and remove Wendy's name and my email address	7.2
8/31/2023	van Alphen, Wendy	Daily Raymond call; Group update call with JS, SO, SM; FU on emails to customers with molds on site; FU letters to customers with molds on site and no signed release; Call with legal counsel re closing checklist; Review deposits; discussion with PR regarding AR; Direction to staff regarding boxing up of documents for shipment to iron mountain; FU with staff regarding inventory count; Discussion with Debra re: ADP set up SD RP0002; Call with Debra re payroll	7.4
9/1/2023	Conorton, Laura	Reports, recording monthly banking entries, trust administration	1.0
9/1/2023	Messina, Stephen	Assisted with tool releases including the organization and documentation of obsolete tools. Rolled forward cash flow model / internal accounting system for the month ended August.	5.8
9/1/2023	Khemani, Bharat	On site at Kitchener unit - Updating daily cash numbers to reflect accurate HST numbers since post-receivership period and following up with customers for obsolete tool releases.	5.4
9/1/2023	Sleeth, Jordan	Various - attend to cure costs payment re: Windsor plant, respond to A&B real estate counsel re: lease assignments and requirements; execute and circulate AarKel transaction closing documents; review offsite assets agreement, calls with D Humphries and W. Van Alphen re: same; call with W. Van Alphen re: AarKel inventory count re: transaction closing.	5.1

Date	Name	Narrative	Hours
9/1/2023	O'Neill, Sandi	Approve shipments going in and out - 1; Review emails from last night; Prepare Deloitte payables- 3; Prepare Deloitte deposit reqs - 0; Print up invoices and logistics to put with payables; Email receivership court order to Regional Hose for Kitchener; Meeting with Livingston to review outstanding invoices cancel current account-new owner information-send Pam's contact information; Meeting with Jorden and Deloitte staff to review o/s items - payroll cut offs, tools releases, etc.; Email from JaniSafe - review statement-email back all invoices paid - contact Pam moving forward.	4.3
9/3/2023	Sleeth, Jorden	Email exchanges with AarKel re: AR/Inv agreement in Windsor.	0.6
9/5/2023	Conorton, Laura	Processing journal entries, recording entries, correspondence with TD, trust administration	1.5
9/5/2023	Messina, Stephen	On site at Kitchener location. Added all transactions up to Sept 5 into the cashflow model. Resolved problematic transactions in the cashflow. Contacted customers for obsolete tool releases.	6.8
9/5/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Review disbursement Cheques, and input Deposits. General Train to LC on JE process for Livingston entries. Prepare Deposit and take to the bank.	4.3
9/5/2023	Cestnick, Winston	On site attendance at Kitchener location - ran morning operations meeting, contacted customers regarding urgent releases of molds, oversaw release of Raymond corp tools, prepared customer releases, dealt with customer tours of inventory on sight	6.2
9/5/2023	Sleeth, Jorden	Onsite attendance - locate offsite assets re: AarKel deal, circulate details re: same to counsel (A&B), discuss same with W. Van Alphen, call with AarKel counsel, calls with M. Van Santvoort of AarKel, call with Corporate Assets re: sale of assets, complete arrangement with AarKel; circulate revised AR/Inv agreement to A&B for revisions; interest calculation for AarKel statement of adjustments; payment review and approvals.	6.5
9/5/2023	van Alphen, Wendy	Meeting with AarKel re closing; Organize count and supervision of same; Release letters to various customers; Approval of expenditures; Details for deposits; Review and approval of payrolls; Attendance with AarKel re: molds & fixtures and obtain AarKel signoff; Meeting with Jorden regarding Kitchener equipment issues	12.3

Date	Name	Narrative	Hours
9/5/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from Friday - 59 - review and respond; Prepare Deloitte payables-11; Prepare Deloitte deposit reqs - 6; Print up invoices and logistics to put with payables; Email suppliers - new owners - send future invoices to Pam - 18; Meeting with Wendy, Laura and Lou-Ann re boxing paperwork; Discussion with Wendy and Larry re inventory count; Review overtime hours for payroll; Scan, rename and email cheque reqs for approval; Help Stephen with cashflow amounts, etc. Email Rose re issued incorrect cheque to Elite Security; Get invoices from Lou-Ann for Stephen and Wendy for monies going into IT's account; Review Windsor payroll - approve; start inventory count with Duane, Wendy, Larry and Brian from Aarkel; Go over/explain inventory count with Collin and three others and Wendy; TCF Duane - looking for Collin's number re Magna coming to pick up parts before 11:00; Scan, rename and email cheque reqs for approval and deposit reqs.	8.3
9/6/2023	Conorton, Laura	Cheques for Inject and Moldco, filing and trust administration	2.2
9/6/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Review disbursement Cheques, and input Deposits. Input Deposits into Ascend. Prepare transfer between account for Moldco and send for approvals.	2.9
9/6/2023	Cestnick, Winston	On site attendance at Kitchener location - prepared customer releases, negotiated final inventory sale pricing, toured customer on site, met with landlord's general contractor re. work on site, prepared customer release documents	6.5
9/6/2023	Messina, Stephen	Updated the daily cashflow model to reflect all transactions up to present day. Communicated with the plastic material scrapper to coordinate release of scrap. Continued to communicate with customer re tool releases.	6.3
9/6/2023	Sleeth, Jorden	Onsite attendance - payment review and approvals; insurance email; Aarkel transaction matters (HST form, track wire payment, calls with Aarkel re: KW assets); email to Clek re: 965 Wilson lease assignment; call with counsel to ADP re: Aarkel transaction; Aarkel proceeds deposit forms.	3.5
9/6/2023	van Alphen, Wendy	Attendance on site; Meetings with Jorden re close; Meetings with Aarek re review and tour of inventory; Pictures taken on current inventory; Various discussions with Aarkel & Jorden; Instructions to staff re - final invoicing; Calls to customers re: shipments of remaining FG; Call to CRA re update	7.4

Date	Name	Narrative	Hours
9/6/2023	O'Neill, Sandi	Approve shipments going in and out - 3; Review emails from last night - review and respond; Prepare Deloitte payables-0; Prepare Deloitte deposit reqs - 0; Print up invoices - review and prep for payment; Walk the Plant - find Steve and discuss email re: inventory - ask Laura to pull invoices and get pricing- talk to Ali regarding same thing; Scan, rename and email deposit reqs to RS Trust; Scan, rename and email cheque reqs to Jorden for approval; Complete tool and fixture inventory list - copy and give to Wendy to review with Larry and sign off; Pull approved payables, date stamp paid and file; Walk through the Plant with Wendy, Larry, Brian and Steve and go over inventory count for resin, parts, etc.; Talk to Pam about SunLife and benefits - email SunLife termination notice for Sept 30/23; Review MDM list of employees gone - give to Pam to remove names from list; Email Debra-HR list of Kitchener employees getting KERP.	7.8
9/7/2023	Conorton, Laura	Website updating, online banking, recording incoming wires	1.0
9/7/2023	Cestnick, Winston	On site attendance at Kitchener location - signing off on mold releases to customers, overseeing outgoing shipments, preparing customer release documents, calling obsolete tool customers regarding last-chance retrieval of molds, negotiating inventory price	5.9
9/7/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Review & input Deposit vouchers into Ascend. Send Transfer between account to TD and prepare Moldco cheque to OSB and efile.	2.5
9/7/2023	Messina, Stephen	Updated the daily cashflow model to reflect all transactions up to present day. Continued to communicate with various customers on tool releases.	6.9
9/7/2023	Sleeth, Jorden	Onsite attendance - meeting with on-site staff re: cleaning plant, last day; update to 965 Wilson landlord re: Clek sublease; call with ADP re: Aarkel transition; call with W. Van Alphen re: Rollstamp and Windsor transition; emails with Corporate Assets re: asset sale to Aarkel; payment reviews, approvals and documentation to S. O'Neil.	4.4

Date	Name	Narrative	Hours
9/7/2023	O'Neill, Sandi	Approve shipments going in and out - 0; Review emails from last night - review and respond; Prepare Deloitte payables- 5; Prepare Deloitte deposit reqs - 5; Print invoices - prep for payment; Reconcile Livingston - missing invoices - ask Lou-Ann to get them - called Zena - LM; Meet with Corporate Assets - walk around to take pictures of three machines going to auction; Set up Lou-Ann with Ali to go take pictures of parts left produced by Deloitte; Set up Lou-Ann to pull out unpaid invoices A/R and put in separate box; Work with Pam to pay Microsoft on-line through WVA - get receipt - delete credit card; TCT Jordan re questions regarding deposit req for AarKel - GL codes, explanation for Rose; Email from Mont's On Time re outstanding invoices looked up - already paid; Scan, rename and email deposit reqs to RS Trust; Email Peter at Elite Security re overpayment on last cheque and to send in final bill; Scan, rename and email cheque reqs to Jordan for approval then to RS Trust for processing TCT Linda re statement and finance charges - got them reversed - did up one rental invoice and send for approval.	8.5
9/8/2023	Cestnick, Winston	Signing off on mold releases to customers, overseeing outgoing shipments, preparing customer release documents, calling obsolete tool customers regarding last-chance retrieval of molds, negotiating inventory price	6.2
9/8/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Review & input Deposit vouchers into Ascend. Prepare Disbursement cheques.	2.4
9/8/2023	Conorton, Laura	Preparing wire payment for ITI to SunLife, recording incoming wires, trust account management	2.0
9/8/2023	Messina, Stephen	Updated the daily cashflow model to reflect all transactions up to present day. Updated the Receipts and Disbursements for the week ended Sept 8. Continued to communicate with various customers on tool releases.	6.4
9/8/2023	Sleeth, Jordan	Planning memo to onsite team; review AarKel comments on AR list to purchase, circulate to W. Van Alphen.	1.0
9/8/2023	O'Neill, Sandi	Review emails from last night - review and respond; Prepare Deloitte payables- 1; Prepare Deloitte deposit reqs - 7; Print invoices - TCT 2 suppliers questioning bill - forward 1 to Pam for payment under AarKel; Issues with Kitchener and Netmon - no service - ask Pam to call Eric at Netmon - issue fixed; Set up Lou-Ann at Plant 2 for labelling and boxing up paperwork and place on skid - do up list; Scan, rename and email payables for approval and deposit reqs to RS Trust; TCF Elizabeth at Livingston- questioned some charges prior to May 26th - will leave message for Zena to call back on Monday; Go check on Lou-Ann at Plant 2 - 1 skid done-finished up boxes at Plant 1; TCT Jordan - quick update about finishing up on Monday; Box up office.	7.4

Date	Name	Narrative	Hours
9/11/2023	Cestnick, Winston	Calls and email correspondence with customers regarding last minute coordination of mold removal, payment instruction, and price negotiation. Also preparing customer release agreements	1.2
9/11/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input Deposit receipted in Ascend. Prepare Disbursement cheque. Prepare transfer between accounts.	1.7
9/11/2023	Messina, Stephen	On site at Kitchener location. Updated daily cashflow for all transactions. Continued to communicate with customers with respect to tool releases and collection of AR. Replaced the bin of scrap metal to continue tool disposal	7.2
9/11/2023	O'Neill, Sandi	Review emails from last night - review and respond; Meet Lou-Ann - organize boxes to put on skids; Team meeting - catch up Kitchener and Windsor - plans for the week - 45 minutes; Travel to Plant 2; Label and stack boxes with Lou-Ann - 8 skids (136 boxes) - call Steve/Marty to move skids - shrink wrap and place ready for pick up - 5 hours; Email from Enbridge re unable to take reading - TCT; Enbridge to see why - instructed on where and how to take reading - was advised credit coming; Email Stephen list of boxes and details for Iron Mountain; Email from Winston re origin needed for product - Forward to Ali and Lois to get information - unable to locate origin - email Winston back advising; Travel back to Plant 1; Talk to Laura re invoicing Rollstamp; Talk to Pam re costing list and downloading Simply for Wendy; Travel back to Plant 2; Review Kitchener and Windsor payroll - issues with ADP - changes made on bonuses, etc. TCT Stephen to go over Kitchener employees - TCT; Wendy to discuss payrolls - go over both one more time with Debra-HR - approved for payment.	8.2
9/12/2023	Cestnick, Winston	Calls and email correspondence with customers regarding last minute coordination of mold removal, payment instruction, and price negotiation. Also preparing customer release agreements	1.8
9/12/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input Deposit receipt. Prepare transfer between accounts and send to TD Bank. Scanning of Receipts & Disbursements.	1.4
9/12/2023	Sleeth, Jordan	Attend to KW lease assignment to Clek.	0.4

Date	Name	Narrative	Hours
9/12/2023	O'Neill, Sandi	Review emails from last night - review and respond; TCF Duane re questions on Rollstamp picking up 51 pieces - what are we doing with the rest - emailed Wendy to ask and let Duane know; Scan list of machines for Corporate Assets to Jorden to discuss missing parts; Print up invoices - review and prep for payment; Email from MNSI for payment - forwarded to Pam - send another email re change of ownership and new email address; Email RS Trust re cheque to Elite mailed yet - responded - pull payable, date statement and file; Email from Fastenal re overpayment - looked up cheque requesting refund; Scan inventory list to Wendy and email list from Steve Burns; Search for cost of ST801 Zytrel for Wendy - ask Ali who purchased from Email Torcon security for full wire details - emailed back to just mail cheque; Find and pull invoices from unpaid A/R box to put with cheques deposited for deposit reqs.	5.7
9/12/2023	van Alphen, Wendy	Various emails and calls	2.2
9/13/2023	Messina, Stephen	On site at Kitchener location. Updated daily cashflow for all transactions. Continued to communicate with customers with respect to tool releases and collection of AR. Organized for the pickup of scrap plastic recycling material	5.3
9/13/2023	Cestnick, Winston	On site attendance at kitchener location - calls with customers negotiating pricing, last minute tool retrieval coordination, overseeing and double checking outgoing shipments, preparation of customer releases	5.9
9/13/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input Deposit receipt. Prepare transfer between accounts and send to TD Bank.	1.1
9/13/2023	Sleeth, Jorden	RollStamp call - prep call with W. Van Alphen, call with RollStamp re: inventory and AR settlement.	1.5
9/13/2023	O'Neill, Sandi	Review emails from last night - review and respond; TCT Pam re deposit made last night-she had questions re are they doing for Deloitte.; Email from Lois - looking for tryout reports - gave her box # and location of reports; Deloitte deposit requisitions - 10; Print invoices - review and prep for payment; Issues with scanning - contact IT support; Scan ,rename and email deposit reqs to RS Trust; TCT Wendy re GL codes on deposits; Email from Pan - scan and email wire information for Formerra; Review emails for Magna - forward to Winston re response; Email Stephen for information on deposit to prep deposit req	5.3
9/13/2023	van Alphen, Wendy	Various emails and calls; Review of inventory; Preparation of inventory listing and tie into count; Preparation of inventory and tie into invoices; Various discussions with Aarkel & Jorden; Instructions to staff re - final invoicing; Calls to customers re: shipments of remaining FG; Call to CRA re update	4.6

Date	Name	Narrative	Hours
9/14/2023	Conorton, Laura	Recording receipts for Injection and Moldco accounts	1.5
9/14/2023	Messina, Stephen	Updated daily cashflow for all transactions. Continued to communicate with customers with respect to tool releases and collection of AR.	3.2
9/14/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Scan and send invoice rec'd mail to S. O'Neil.	0.8
9/14/2023	O'Neill, Sandi	Review emails from last night - review and respond; Scan deposit slips and send to RS Trust - 11; Forward Cintas invoice to Pam for payment; Deloitte deposit reqs - 2; TCT Pam re invoices coming in TCF Stephen re questions for cashflow re Livingston; TCT Lou-Ann - ask if she would do A/R calls for Deloitte - send email to get email address - forward to Wendy; Email from Zena at Livingston re reconciliation of account - asking Manager to reverse Scan and email Livingston spreadsheet to Stephen for cashflow; TCT and email to Stu at KoneCranes - LM re repairs to cranes; Email Stephen to inquire status on Iron Mountain; Email from KoneCranes to schedule repairs - TCT Rob Kolody re: repairs to be done afternoon shift.	5.6
9/14/2023	van Alphen, Wendy	Attendance on site and review inventory with Duane	4.8
9/15/2023	Cestnick, Winston	On site attendance at kitchener location - phone calls with customers coordinating outgoing shipment timing, staff planning, tool retrieval negotiation, overseeing outgoing shipments, preparation of customer releases	6.4
9/15/2023	Conorton, Laura	Correspondence with TD on wire details, recording receipts, trust administration.	0.8
9/15/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.7
9/15/2023	Messina, Stephen	Updated daily cashflow for the week-end. Calculated the adjusted AR amount to be transferred with respect to the sale of AR to AarKel (Windsor Business). Communicated with HR regarding MOL Summons received.	6.3
9/15/2023	Sleeth, Jordan	Various - review and approve payments; liaise with Clek re: lease assignment; AarKel w/c transaction - circulate agreement, circulate inventory listing and updated A/R listing for collections to Sept 14, circulate to AarKel with deal considerations, calls with W. Van Alphen re: AarKel requests. Call with T. Hogan re: bankruptcy filing, distribution motion; review Ministry of Labour summons and response letter.	5.6

Date	Name	Narrative	Hours
9/15/2023	O'Neill, Sandi	Review emails from last night - review and respond; Print up invoices - review and prep for payment; Print up deposit from Pam - pull invoices and prepare deposit req; Deloitte payables - 5; Deloitte deposit reqs-4; Email from Duane - getting KoneCranes to come in Sept 25th in the a.m.; Email from Duane re where are the keys and if Wendy and I still had them - responded where I left the box and advised I'm keeping a set until Iron Mountain picks us the skids of boxes; Scan, rename and email cheque reqs to Jordan for approval; Scan, rename and email deposit reqs to RS Trust; LM with Winston to call to discuss Masco's deposit US vs CAD, etc.	6.2
9/15/2023	van Alphen, Wendy	Various customer calls; Discussion with Jordan; Review with Stephen AR and prep for sale to AarKel	3.5
9/17/2023	Sleeth, Jordan	Finalize AR schedule and circulate to AarKel.	0.7
9/18/2023	Messina, Stephen	On site at Kitchener location. Coordinated release of tools to customers, contacted suppliers to negotiate terms of service, updated daily cashflow. Discussed various points of contention with auctioneer and staff on site.	6.5
9/18/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Prepare disbursement cheques, have signed and mail out. Discussion with S. O'Neil regarding Deposits.	1.1
9/18/2023	Cestnick, Winston	Preparation of customer release documents, calls with customers regarding pricing, final notices of required action before disposal, mold base price negotiation for sale, preparation of customer release documents for mold bases	4.6
9/18/2023	O'Neill, Sandi	Review emails from the weekend - review and respond; Print up bank statements - prep for deposit reqs - TCT Winston for explanation on Masco deposit - get paperwork from Wendy on Skyjack for deposit; Team meeting with Jordan, Stephen, Winston and Wendy - discuss various items for this week, ROE's, T4's, CRA, etc.; Review payroll - TCT Debra ask questions regarding O/T - ask to make changes - print up written hours - changes made - reviewed and approved	3.0
9/19/2023	Conorton, Laura	Preparing stop payment, reviewing transaction for re-issuing cheque, recording incoming wire, online banking review	1.0
9/19/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Review Ascend for disbursements.	0.7
9/19/2023	Cestnick, Winston	On site attendance at kitchener location - calls with customers coordinating pickup, coordinating removal of signage from property to avoid landlord charges, preparation of mold base release documents, final price negotiations for mold base sales	6.6

Date	Name	Narrative	Hours
9/19/2023	Messina, Stephen	Updated daily cashflow. Calculated HST amounts paid and collected over the receivership period. Discussed roll off existing controller and documents required to close books. Communicated with plastic and metal scrappers to pickup all remaining waste.	6.6
9/19/2023	Sleeth, Jordan	Various - CWB lease PoC; MoL update from R. Danter; coordinate sign removal per Landlord request; emails to Rollstamp and AarKel re: status of agreements and settlements, review AarKel adjustments to inventory purchase; draft update memo to TD in advance of update call.	3.8
9/19/2023	O'Neill, Sandi	Review emails from last night - review and respond; Email Debra-HR re need copies of all ROE's for Deloitte; Email Randy and Alift re last repairs for forklift - work completed - invoice coming; Email Zena at Livingston re account update and status of credit owing to Deloitte; Print up on bank statements - prep for deposit reqs; TCF Cascades re outstanding invoices - had wrong email address - resending review; Print up invoices - review for payments; TCT MDM re cheque issued wrong due to misinformation - we had credit not amount owing - send RS Trust copy of cheque to void and redo original cheque for RS Trust; Email from IT to look up packing slips for Polytech and invoices - TCT Pam for copies of invoices never received back in May 2023 and packing slips - TCT Wendy to go over; Pull payables - date stamp and file; Deposit reqs - 2	4.8
9/20/2023	Cestnick, Winston	On site attendance at kitchener location - reviewing rollstamp final inventory offer and pricing, mold base price negotiations, coordinating outgoing mold base shipments, negotiating mold base pricing, preparation of customer release documents	6.7
9/20/2023	Conorton, Laura	Recording incoming wires, finalizing stop payment, online banking lookups	1.5
9/20/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input deposit received.	0.5
9/20/2023	Messina, Stephen	Updated daily cashflow. Drafted the updated ERV for current scenario.	6.8
9/20/2023	Sleeth, Jordan	Various - review CRA update; email exchange with R. Danter re: MoL claim; payment review and approvals; review Rollstamp offer. AarKel inventory deal - email to AarKel re: Adjustments, call with L. Delay re: same, revise offer and email same to AarKel.	0.5

Date	Name	Narrative	Hours
9/20/2023	O'Neill, Sandi	Review emails from last night - review and respond; Scan deposit reqs to RS Trust; Email from Deloitte re picking up skids - respond re labels; Print up invoices; TCT Rogers re change of info on new owners - forward bill to Pam - Email from Deloitte re picking up skids - respond re contents of boxes; Deposit reqs - find and pull invoices - 7; Scan and email rest of deposit reqs to RS Trust -.5; Invoices from FedEx from Pam - TCT FedEx - paid one - one is still outstanding - asked for summary to be emailed to confirm date; Cheque reqs - 1- scan to Jordan for approval; Email from AarKel re Rogers bill - wants us to terminate - respond back re termination fees - Pam to discuss with Brian from AarKel; TCF Laura at Deloitte re questions and explanation on Masco deposit requisition	5.3
9/21/2023	Cestnick, Winston	Contacting and calling customers regarding last day outgoing releases, preparation of customer release documents, preparation of employee termination documents, preparation of employee temporary retention letters	4.6
9/21/2023	Conorton, Laura	Recording incoming wire, processing re-do of cheque for Moldco	1.0
9/21/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input deposit received. Disbursement cheques.	0.8
9/21/2023	Messina, Stephen	On site at Kitchener location. Discussed various items with auctioneer regarding the sale of assets. Facilitated the release of 50 gaylords of plastic waste and obsolete tools. Issued letters of termination to the remaining employees. Updated daily cash flow.	5.5
9/21/2023	O'Neill, Sandi	Review emails from last night - review and respond; Print up invoices - review for payment; Forward invoices to Pam for AarKel to pay; TCF Stephen re HST returns for ITI and Moldco - sent email to Richard at CRA for confirmation - forward response to Stephen to file Moldco returns for May, June and July; Scan and email Polytech invoices and packing slips to Wendy for review and confirmation of payment for either Deloitte or AarKel - Deloitte cheque reqs - 3; Deloitte deposit reqs - 1; Scan and email cheque reqs to Jordan for approval - once approved scan to RS Trust; TCF James at Mel Tech re discussion on settlement - states he doesn't owe Moldco any money - emailed Stephen to provide copy of invoice; 1 Review emails from this afternoon; Respond to Winston re Integrilift re already paid last bill; Forward cheque reqs to RS Trust; Print up CWB invoice - prep for payment - wait for wire instructions; Pull payables - date stamp and file	5.7
9/22/2023	Cestnick, Winston	On site attendance at kitchener location - overseeing employee item releases, releasing of final customer goods (river birch), preparation of customer release documents, research into EDC insurance claims on AR, phone calls regarding upcoming auction	5.6

Date	Name	Narrative	Hours
9/22/2023	Conorton, Laura	Processing wire to First West Leasing for Moldco, Processing wire payment to DRI, trust administration	1.2
9/22/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Input deposit received. Disbursement cheques. Prepare deposit and take to the bank.	1.9
9/22/2023	Messina, Stephen	Provided updates to support the closing of the sale with AarKel. Communicated with leasing company to release select assets. Communicated with internal specialists to ensure all data is backed up and ready for disposal. Facilitated release of customer tools	6.7
9/22/2023	Sleeth, Jordan	AarKel AR and Inventory agreement- review revised agreement, update and executed forms, circulate to AarKel and counsel, calls with S. Messina re: schedule edits.	1.5
9/22/2023	Sleeth, Jordan	Team call re: outstanding activities; emails with Landlord re: site access; email to Netmon re: offsite IT access; review Ontario grant claim, call with Ontario re: same; review Ont Min of Fin. letter, contact and circulate email re: same; email to D. Science (Deloitte) re: SWODF grant.	1.4
9/23/2023	Sleeth, Jordan	Emails with T. Hogan re: KW lease assignment to Clek.	0.3
9/25/2023	Conorton, Laura	Finalizing wire, trust administration banking, file coordination, correspondence with TD	0.5
9/25/2023	Cestnick, Winston	Updating and reviewing customer release (legal) agreements for rollstamp (magna) and river birch (biodisk). Finalizing price/payment negotiations with river birch. call with HR regarding ROE reports for terminated employees	2.6
9/25/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team, Disbursement cheques.	0.5
9/25/2023	Messina, Stephen	Rolled forward previous ERV making iterations to the R&D format and removing obsolete information. Updated daily cashflow, communicated with leasing company to release assets at Kitchener location. Setup the buyout of a lease for sale in auction.	6.9
9/25/2023	O'Neill, Sandi	Travel to Plant 2 to meet Lou-Ann; Go over procedure for blue Iron Mountain labels for the 138 boxes and record them on main sheet; Talk to Debra-HR re final payroll for Windsor and Kitchener today - remind her to do up reports for CRA - can discuss with Wendy - answer questions re	6.9
9/25/2023	van Alphen, Wendy	Review & approve payroll; email to TD re same	0.5
9/26/2023	Conorton, Laura	Process payments and wire transfers.	1.8
9/26/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.3

Date	Name	Narrative	Hours
9/26/2023	Messina, Stephen	Finalized R&D as at Sept 22. Rolled forward AR continuity to ensure all receivables are truly collectible or doubtful and summarized outstanding AR to be followed up on. Updated daily cashflow.	7.6
9/26/2023	Sleeth, Jorden	Various - payment review and approvals; review final Rollstamp settlement agreement, execute and circulate.	0.4
9/26/2023	Cestnick, Winston	Call with production manager regarding scheduling of final rollstamp (magna) shipments, updating final release document, call with magna AP team reconciling invoices	2.3
9/26/2023	O'Neill, Sandi	Review emails from last night - print up invoices - Pull payables, date stamp and file; Deloitte cheque reqs - 3; Deloitte deposit reqs - 1; Scan and email cheque reqs to Jorden for approval; Scan and email deposit reqs to RS Trust; Print up invoice from Logusz Consulting - email them	4.7
9/26/2023	van Alphen, Wendy	Call with CRA regarding Source deductions and audit concerns; various emails with customers	1.2
9/27/2023	Conorton, Laura	Recording incoming wire	0.2
9/27/2023	Messina, Stephen	Updated daily cashflow. Compiled R&D and new AR into the ERV and assessed the future costs remaining to be paid out by estimating each cost or reconciling undeposited cheques.	6.2
9/27/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.3
9/27/2023	O'Neill, Sandi	Review emails from last night - print up invoices - respond to emails; TCT GFL re remove Deloitte's name from invoice - still Print online bank accounts - review and prep for deposit	3.3
9/27/2023	Cestnick, Winston	Call with Windsor plant coordinating skyjack shipment, internal calls coordinating final item transition, finalizing and reviewing final employee payroll entries and amounts	1.2
9/28/2023	Conorton, Laura	Processing wire for Manu Vic, reviewing previous requests for disbursements from July/23, trust administration; entering cheques for Inject/Moldco	1.5
9/28/2023	Messina, Stephen	Finalized ERV for bank review, updated daily cashflow, prepared documentation for bankruptcy filing	6.8
9/28/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Review GL for payment to Cascade for S. O'Neil Prepare Disbursement cheques.	1.0
9/28/2023	Sleeth, Jorden	Various - Review R&D and projected R&D; payment review and approvals; GST/HST issue on Livingston invoices (discuss with S. O'Neil and R. Brown); bankruptcy planning with R. Williams.	3.5
9/28/2023	Cestnick, Winston	Attend onsite in Kitchener re: landlord baseline damage tour, meet with realtor, review tool removals and related settlements.	5.2

Date	Name	Narrative	Hours
9/28/2023	O'Neill, Sandi	TCF Josie from WSIB - questions re balance o/s - receivership, new owners, etc.; TCF Rose re questions on Mel Tech cheque req - Review emails from last night - print up invoices - respond to emails; TCT Davino Davis from	4.3
9/28/2023	van Alphen, Wendy	Call with Stephen regarding ERV and approach	1.8
9/29/2023	Messina, Stephen	Communicated with documents and records to arrange for boxes and tags for Iron Mountain, held discussions with forensics to ensure all computers are imaged and wiped. Cleared partner comments on ERV	4.5
9/29/2023	O'Neill, Sandi	Travel to Plant 2 to meet Iron Mountain; Assist Iron Mountain with pick up of 139 boxes; Pick up copies of ROE's, etc., from Debra-HR; Travel to Plant 1 - meet with	3.8
9/29/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Prepare Disbursement cheques. Scan cheques and invoice rec'd in the mail and send to S. O'Neil.	0.7
Total			584.7



Invoice 8004157674

Deloitte Restructuring Inc.

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Date: November 17, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the
receivership order dated May 26, 2023 for the period October 1, 2023 to
October 28, 2023.

Please see attached appendices.

HST applicable 79,983.50

Expense

Out-of-pocket Expenses:

- Transportation (e.g. mileage, taxi, public transit, tolls,
parking) 3,046.66

HST applicable 3,046.66

Sales Tax

HST at 13.00 % 10,793.92

Total Amount Due (CAD) 93,824.08

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8004157674	93,824.08	Payment for invoice 8004157674

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1



**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	18.1	725.00	13,122.50
Brown, Rose	Manager - Trust Accounting	14.7	350.00	5,145.00
O'Neill, Sandi	Manager - Consultant	27.8	350.00	9,712.50
Messina, Stephen	Senior	112.3	295.00	33,128.50
Cestnick, Winston	Analyst	0.9	250.00	225.00
Conorton, Laura	Analyst	4.4	250.00	1,100.00
Alleyne, Jaylon	Analyst	20.0	250.00	5,000.00
Casey, Brian	Senior Manager - Data Preservation	2.0	525.00	1,050.00
Dew, Todd	Senior	1.0	250.00	250.00
Pardinas, Elijah	Senior	45.0	250.00	11,250.00
Total Professional Hours and Fees		246.2		79,983.50
Out-of-pocket Expenses				3,046.66
Transportation (e.g. mileage, taxi, public transit, tolls, parking - detail below)			3,046.66	
Mileage			2,777.73	
Parking			88.39	
Tolls/Road Charges			180.54	
Total Fees and Expenses (CAD)				83,030.16



Appendix #2

Work performed from October 1, 2023 to October 28, 2023

Date	Name	Narrative	Hours
10/2/2023	Casey, Brian	Data cleansing and meeting	1.0
10/2/2023	O'Neill, Sandi	TCF Laura from Enwin re final account; review emails from the weekend, process invoices for payment, forward certain invoices to Pam for payment by AarKel, Email S, Messina re: Netmon invoices.	1.0
10/3/2023	Cestnick, Winston	Coordinating final inventory and item pickups for rollstamp, coordinating CAD releases, scheduling General Contractor visits for premissis	0.9
10/3/2023	Messina, Stephen	Updated daily cashflow, coordinated with controller on remaining AR continuity, coordinated with leasing company to release forklifts, held discussions with the team to prepare for the document packing & wiping of computers.	8.2
10/3/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Disbursement cheques.	1.3
10/3/2023	Conorton, Laura	Processing wire payment to 41 Ardelt	0.5
10/3/2023	Sleeth, Jorden	Various - review and process rent payments (41 Ardelt); review and approve various payments.	0.4
10/3/2023	O'Neill, Sandi	Email review; process invoices for payment, Email Pam for deposit details, forward Liftow invoice to Stephen and Jorden for payment; prepare Deloitte cheque reqs - 10; Email Davino at Cascades - f/u on last invoice and shipping ID; Email Zena at Livingston - f/u on credit to Deloitte - responded credit approved-should be receiving shortly; Scan and email cheque reqs to Jorden for approval; Email approved cheque reqs to RS Trust, Stephen and Wendy; TCT Lou-Ann to discuss doing up invoice for contract services for Deloitte - all done; A/R calls - TCT to Wendy to confirm done calls - do up invoice for hours worked; Email Mold Masters - f/u on o/s invoice - respond to Stephen's mail re not paying; advised if delivered after May 26th - supposed to pay - waiting for BOL or shipper; Pull payables, date stamp and file; Print MDM invoice for benefits - forward to Jorden and Stephen re questions on cancelling - TCT Angela at MDM re correct amount owing - do up email to terminate policy as at Oct 1/23 - Discussed benefits cut off with Stephen.	4.0
10/4/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Input deposit. Scan mail rec'd and send to Team. Prepare deposit for cheque rec'd and take to the bank.	1.4

Date	Name	Narrative	Hours
10/4/2023	Messina, Stephen	Prepared for documentation of records at Kitchener facility. Updated daily cashflow. Generated payroll register for select ongoing employees.	7.7
10/4/2023	Sleeth, Jordan	Clek lease assignment - call with T. Hogan re: lease assignment	0.5
10/4/2023	Sleeth, Jordan	Review CRA HST assessment, circulate queries to S. Messina; review SoA and creditor lists and provide edits.	2.0
10/4/2023	O'Neill, Sandi	Process invoices to review for payment - prepare deposit from Pam, forward legal bill to Jordan for September along with July and August ones - TCT and email to Angela at MDM Insurance benefits re - questions to Stephen for answers - Email from Mold Masters re BOL - print - email for confirmation of amount and address to send cheque - Print up invoices from Enbridge, Mold Masters, notices from CRA and Enwin; Respond to Jordan's email re valid bills from Enwin - Pull invoices for deposit - Email from Cascades - unable to locate last shipping ID - crediting account	2.0
10/5/2023	Messina, Stephen	On site at client location. Boxing documents and records of MoldCo over the last 7 years to be sent to Iron Mountain.	9.0
10/5/2023	Alleyne, Jaylon	Onsite attendance at 4 Ardelt to box company records and create index for delivery to Iron Mountain.	9.0
10/5/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Input deposits back up information, Start to prepare disbursement cheques.	1.5
10/5/2023	Conorton, Laura	Correspondence with TD on incoming wire	0.5
10/5/2023	Sleeth, Jordan	Meeting with R. Williams re: bankruptcy filing forms.	0.5
10/5/2023	Sleeth, Jordan	Review insurance renewal invoices, email to NFP/Broker re: same; review ERV, emails to S. Messina re: same.	2.0
10/5/2023	Pardinas, Elijah	Attend at client site, disassembling and removing drives to be wiped, evidence management	12.5
10/5/2023	O'Neill, Sandi	Online banking review and prepare deposit reqs; Email RS Trust, Stephen and Winston for infor on wires - Deloitte cheque reqs - 7 - Deloitte deposit reqs - 8 - Scan and email cheque reqs to Jordan for approval - Scan and email deposit reqs to RS Trust, Jordan, Stephen and Wendy - Print up NFP email and invoices from Jordan for payment - Email approved cheque reqs to RS Trust for processing - TCF Pam at IT asking about DLL lease payments - find and send cheque req Deloitte paid - Review emails - forward email for KB Components to Wendy re discounts; Email from Angela -MDM Insurance looking for response re 1 person on benefits - advised Stephen to answer questions	3.8
10/6/2023	Conorton, Laura	Processing wire payment to Val Alphen & Associates	0.5

Date	Name	Narrative	Hours
10/6/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Prepare disbursement cheques.	1.1
10/6/2023	Messina, Stephen	Updated daily cashflow and finalized ERV for bank update. Coordinated with auctioneer on final details, collaborated with software team to ensure computers are imaged / wiped.	7.5
10/6/2023	Sleeth, Jorden	Review of ERV and finalize same, circulate to TD with email cover memo.	2.5
10/6/2023	Pardinas, Elijah	Setup equipment for drive wiping and evidence management, discussion with team and auctioneer	7.5
10/6/2023	O'Neill, Sandi	Review banking and prepare deposit reqs; Deloitte deposit req - 1 - Review NFP invoices - questions on one - TCT Jorden to discuss - f/u with email to deal - with next week - Pull payables - date stamp and file - Review emails - pull payables, date stamp and file; Review email from Stephen re Raymond wire - look up invoices - TCT to discuss	1.3
10/7/2023	Pardinas, Elijah	Drive Wiping (setup, monitoring, wiping, evidence management)	2.0
10/8/2023	Pardinas, Elijah	Wiping Drives	2.0
10/9/2023	Pardinas, Elijah	Wiping Drives (including monitoring, verifying)	4.0
10/10/2023	Messina, Stephen	Updated daily cashflow. Communicated with auctioneer with respect to upcoming sale. Discussed asset releases with lessors. Discussed with internal forensics team on computer wiping and imaging.	5.5
10/10/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Pull 2nd online report and send to SM.	1.1
10/10/2023	Sleeth, Jorden	Various - Review outstanding items listing and provide comments to S. Messina; execute HST invoice for Corporate Assets; execute bankruptcy filing forms; update memo to T. Hogan; call with auctioneer re: auction planning.	2.0
10/10/2023	O'Neill, Sandi	Review and respond to various emails; TCT Enbridge - looking for refund - being mailed this week; email RS Trust to advise; Email to Zena at Livingston - looking for credit wire - will look into it and advise me; Review emails - respond re invoices to Pam and Debra re payroll fees - get invoices from Pam and forward to Stephen and Wendy - answer Pam re paying Polytech	1.0
10/11/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.3
10/11/2023	Messina, Stephen	Liaised with leasing company, had discussion with Auctioneer, communicated with Rollstamp / other customers re outstanding amounts.	4.2

Date	Name	Narrative	Hours
10/11/2023	Sleeth, Jordan	Update call with M. Lafortune and X. Jia re: ERV, auction, bankruptcy filing; debrief with S. Messina. Various e-mails with Rollstamp re: revised payment process.	0.8
10/11/2023	O'Neill, Sandi	Review and respond; Respond to Zena from Livingston re banking information for wire - send her another copy with bank letterhead and signature - Email Pam re bank deposits and Debra re ADP - Respond to Pam re Polytech - waiting on Wendy	0.5
10/12/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.4
10/12/2023	Messina, Stephen	Held discussions with ADP on setting up the (late) payroll accounts properly to ensure transfer, discussed transfer of vehicle ownership with AarKel, terminate two remaining employees, drafted ERV bridge.	5.3
10/12/2023	Sleeth, Jordan	Meeting with S. Messina re: outstanding items and priorities to advance same; review preliminary reports to creditors.	1.0
10/12/2023	O'Neill, Sandi	Review and respond to various emails; Print up online banking report - prep for deposit slips - TCT Pam to discuss Polytech and email to Stephen for details on sale of assets for deposit req; Review emails - review and respond; Email Sieglund at Polytech for banking information to complete wire; Deloitte deposit reqs - 2 - Scan and email deposit reqs to RS Trust	1.5
10/13/2023	Messina, Stephen	Updated daily cashflow file, continued developing ERV bridge.	5.3
10/13/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Input deposits. Scan mail rec'd and send to the team.	1.0
10/16/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Prepare deposit slip and take to the bank. Input/scan receipt voucher and save on Q drive.	1.0
10/16/2023	Sleeth, Jordan	Rollstamp account reconciliation - review, memo to J. Walton at Rollstamp re: deliveries and payment.	1.0
10/16/2023	Pardinas, Elijah	Communications with Netmon to ensure decommission of Server and evidence management/preparation for next day on-site visit.	0.5
10/16/2023	Messina, Stephen	Updated daily cashflow. Drafted email to provide to Rollstamp re collections and removal of inventory. Developed cheque req's for the final payment of engineer and controller wages. Coordinated logistics with team to be on-site the following day.	7.5

Date	Name	Narrative	Hours
10/16/2023	O'Neill, Sandi	Review and attend to 31 emails from Thursday; Review, respond, print up invoices, online banking reports; prep for deposit req, mail from Deloitte; TCF Pam -IT - catch up on deposits, wire infor for Polytech - email her NextGen remittance slips - print up wire info - 30 minutes - TCT/TCF Stephen - catch up meeting re emails - A/R - explained Polytech, benefits for Steve M - 30 minutes - Deloitte cheque req - 1 - Deloitte deposit req - 2 - Scan and email cheque req to Jordan for approval - Scan and email deposit reqs to RS Trust - Review emails - send approval and wire cheque req to RS Trust; Print up cheques received from RS Trust - respond to them re can deposit - email Stephen to confirm account money going into and GL code - Email Duane, Pam and Ali - Polytech wire sent to RS Trust for processing	3.0
10/17/2023	Conorton, Laura	Processing wire to Polytech, correspondence with TD	0.7
10/17/2023	Messina, Stephen	On site at Kitchener location. Boxed, documented and tagged ~90 bankers boxes worth of information to be stored at third party facility. Discussed various assets with auctioneer regarding the result of the sale.	9.0
10/17/2023	Dew, Todd	Bank Reconciliations	1.0
10/17/2023	Alleyne, Jaylon	Onsite attendance at 4 Ardelt to box company records and create index for delivery to Iron Mountain.	9.0
10/17/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Reveiw/Input/scan receipt voucher for Livingston wire and save on Q drive. Prepare disbursement cheques.	1.4
10/17/2023	Sleeth, Jordan	Clek sublease - review Clek comments, circulate to Landlord counsel.	0.4
10/17/2023	Pardinas, Elijah	Attendance on-site at 41 Ardelt. Reinstallation of Wiped Drives into on-site machines. Disassembly, removing, wiping, monitoring, and reinstallation of Jeff D's drive. Shutdown/decommission of File Server/QNAP machine in storage room. Searching premises for laptop.	10.0
10/17/2023	O'Neill, Sandi	TCF Rose-Deloitte - discussion on Livingston's deposit req - looking for 2 invoices to clear account - find invoices and scan and email them to Rose - Deloitte cheque reqs - 3 - Scan and email cheque reqs with approval to RS Trust - Review emails - print up revised deposit req; Pull payables - date stamp and file - Email and TCF Laura-RS Trust re confirmation of JP Morgan Bank address; Email from Linde re outstanding invoies - TCT Tiffany - LM to discuss	1.8
10/18/2023	Messina, Stephen	Updated daily cashflow, rolled forward AR schedule and circulated to the team to develop a plan on future collections, communicated with several customers on collections and Windsor site on invoices to be paid	7.4

Date	Name	Narrative	Hours
10/18/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.3
10/18/2023	Sleeth, Jordan	Rollstamp deliveries - discuss with S. Messina email to J. Walton.	0.5
10/18/2023	Casey, Brian	Review of Data and requirements	0.5
10/18/2023	Pardinas, Elijah	Transporting QNAP/Server in BAE, Evidence Management, Loading of Laptop Image, processing forensic image for user file review	2.5
10/18/2023	O'Neill, Sandi	Pull payables - date stamp and file - Print up online banking reports - prep for deposit reqs - Email Laura at MDM Insurance - advise payee name and cc Rose and Stephen - Deloitte deposit reqs - 2 - Scan and email deposit reqs to RS Trust, Jordan, Stephen and Wendy - TCT and email Linde re outstanding invoice and finance charges	1.3
10/19/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team. Preparing disbursement cheques.	0.5
10/19/2023	Sleeth, Jordan	Review ERV bridge and revise, circulate to TD with legal and receiver invoices.	1.5
10/19/2023	Casey, Brian	Review of Data and requirements	0.5
10/19/2023	Pardinas, Elijah	Review of Microsoft365 Audit Logs/Environment, Touchpoint meetings, Processing of laptop user files, culling of OneDrive pointer files, extraction of User Files for review/additional processing in Relativity. Addressing former employee question	2.5
10/19/2023	Messina, Stephen	Updated daily cashflow, quantified differences on HST filing due to an input error in August and determined September amounts to be filed. Communicated with Rollstamp to execute a shipment of all packaging materials. Mapped entries for Ascend upload	5.5
10/19/2023	O'Neill, Sandi	Respond to Linde re account up to date - Scan KB Components invoice and send to Stephen - Print up online banking reports - email RS Trust -looking for name for wire to prep deposit req	0.5
10/20/2023	Brown, Rose	Trust Banking Adm - Pull online report & reconcile to GL send reports to Team.	0.3
10/20/2023	Conorton, Laura	Processing wire payment to DRI	0.5
10/20/2023	Pardinas, Elijah	Preserving local files on the device within forensic container, processing in Relativity for ease of review.	1.5
10/20/2023	Messina, Stephen	Coded all banking transactions in company accounts with Ascend GL's to transfer all funds	7.3
10/20/2023	Alleyne, Jaylon	Indexing company records for Iron Mountain.	2.0

Date	Name	Narrative	Hours
10/20/2023	O'Neill, Sandi	Review and respond to emails; Print up final bill from Enwin for 4350 Industrial Dr; TCT Enwin for explanation - Print up Skyjack invoices to do deposit req - do up deposit req - can and email to RS Trust	1.0
10/23/2023	Conorton, Laura	Processing cheques from receivership accounts to be deposited into 3rd party account for retainer	0.8
10/23/2023	Messina, Stephen	Filed HST return for September for ITI and MPI, revise August HST filing. Updated daily cashflow. Finalized first draft of AarKel AR reconciliation and sent to relevant parties. Generated Rollstamp packing slip for previous shipment.	8.2
10/23/2023	Brown, Rose	Pull online report and reconciled and send to the Team.	0.2
10/23/2023	Sleeth, Jordan	Review Rollstamp invoicing, review AarKel A/R reconciliation, calls with S. Messina re: same.	1.0
10/23/2023	O'Neill, Sandi	Email Pam re deposit still not done from last week - Print up online banking reports - advise deposit req for Oct 18th - Deloitte cheq req - 2 - Email to Jordan for approval with explanation for 2nd final bill - Enwin - Email Stephen to ask about still using Superior Propane - received another bill - Review emails - send approved cheque req to RS Trust; Still using Superior Propane - do up cheque req and email to Jordan for approval - Review emails; Print up invoice for Manu Vic - Email cheque req to RS Trust	1.0
10/24/2023	Messina, Stephen	Monitored bank account. Communicated with various customers on outstanding amounts. Prepared Rollstamp packing slip. Generated cheque req for lawyer fees. Adjusted AarKel AR reconciliation and prepared rebuttal email.	4.8
10/24/2023	Brown, Rose	Pull online report and reconciled and send to the Team. Prepare disbursement cheques.	0.9
10/24/2023	Sleeth, Jordan	Call and emails with S. Messina re: AarKel protocols, payment approvals.	0.4
10/25/2023	Messina, Stephen	Updated daily cashflow, updated AR collections, adjusted AarKel settlement, called customers with respect to outstanding amounts, coordinated last shipment of production goods to Rollstamp, paid cheques for leases	8.7
10/25/2023	Sleeth, Jordan	Letter to AarKel re: AR Collections, discuss same with S. Messina.	0.8
10/26/2023	Conorton, Laura	Processing wire to 41 Ardelt Management Group	0.5
10/26/2023	Brown, Rose	Pull online report and reconciled and send to the Team. Prepare disbursement cheques.	0.9
10/26/2023	Messina, Stephen	Prepare cheque requisitions to pay Steve Moutoux.	1.2

Date	Name	Narrative	Hours
10/26/2023	Sleeth, Jordan	Call with J. Walton of Rollstamp re: payments an deliveries.	0.3
10/27/2023	Conorton, Laura	Recording deposits for Injection Tech	0.4
10/27/2023	Brown, Rose	Pull online report and reconciled and send to the Team. Prepare disbursement cheques. Prepare and made a deposit to Moldco account.	1.1
10/27/2023	Sleeth, Jordan	Asset removal issues - call with Landlord electrician re: equipment removal, emails re: same to S. Messina.	0.5
10/27/2023	O'Neill, Sandi	Review and attend to 27 emails; Print up invoices - prepare for payment; Print up online banking - review and prepare for deposit reqs - gather up information; Pull payables from Monday - date stamp and file; TCT Pam at ITI - ask for deposit slip from the 23rd to prepare deposit req - discussion on invoices for NextGen - she advised no longer assisting Deloitte after October 31st - send requests to AarKel Team; TCT Stephen - catching up from the week - discussion on info for invoices for NextGen - question re transfer of money into ITI - need information - updated on A/R and AarKel; Deloitte cheque reqs - 2; Pull unpaid A/R invoices from box to prepare for deposit req; Deloitte deposit reqs - 4; Scan and email cheque reqs to Jordan for approval; Scan and email deposit reqs to RS Trust; Email Rose to inquire when MDM cheque will be deposited to do deposit req	4.3
Total			246.2



Invoice 8004234575

Deloitte Restructuring Inc.

Bay Adelaide Centre
8 Adelaide Street West, Suite 200
Toronto ON M5H 0A9

ATTN: Mr. Matt Lafortune
TD Commercial Bank
66 Wellington Street West, 12th Floor
Toronto ON M5K 1A2
Canada

Tel: (416) 601-6150
Fax: (416) 601-6151
www.deloitte.ca

Date: December 07, 2023
Client No.: 1139799
WBS#: TDB00716
Engagement Partner: Jordan Sleeth

GST/HST Registration: 122893605RT0001
QST Registration: 1012314163TQ0001

For professional services rendered

Fees

Re: Administration of the receivership of Injection Technologies Inc.,
Moldco Plastics Inc. and Moldco Holdings Inc., pursuant to the
receivership order dated May 26, 2023 for the period October 29, 2023 to
December 2, 2023.

Please see attached appendices.

HST applicable 55,311.50

Expense

Out-of-pocket Expenses:

- Accommodations - Hotel 653.75
- Records Storage Charges 118.26
- Transportation (e.g. mileage, taxi, public transit, tolls,
parking) 1,025.55

HST applicable 1,797.56

Sales Tax

HST at 13.00 % 7,424.18

Total Amount Due (CAD) 64,533.24

Accounts shall be due and payable when rendered. Interest shall be calculated at a simple daily rate of 0.0493% (equivalent to 18% per annum). Interest shall be charged and payable at this rate on any part of an account which remains unpaid from thirty(30) days after the invoice date to the date on which the entire account is paid.

Use the following payment methods and ensure your payment contains the details provided in the example.

Client Name	Client#	Invoice#	Amount (CAD)	Comments
TD Commercial Bank	1139799	8004234575	64,533.24	Payment for invoice 8004234575

Contact:

Please send payment confirmation by email to: receivablesdebiturs@deloitte.ca, and reference the invoice number(s) paid

Payment Options

1. EFT Payments(remittance email mandatory) :

Preferred Method

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Transit – Institution : 47696-002

Account Number : 1590219

USD Payment

Transit – Institution : 47696-002

Account Number : 1363514

2. Wire Payment :

Bank of Nova Scotia: 44 King Street West, Toronto, Ontario M5H 1H1

CAD Payment

Account Number : 476961590219

Swift Code : NOSCCATT

USD Payment, Beneficiary Bank (Bank of Nova Scotia) :

Account Number : 476961363514

Swift Code : NOSCCATT

Clearing Code : CC000247696

Address: P.O. Box 4234 STN A, Toronto ON M4W 5P6

USD Payment, Intermediary Bank (Bank of America NA) :

Address: 222 Broadway, New York, NY 10038

Account Number : 476961363514

Swift Code : BOFAUS3N

ABA Routing Number : 026009593

Note: Intermediary Bank information may not be required for payments coming from outside the US

3. Online Payment :

Select either Deloitte LLP or Deloitte S.E.N.C.R.L./s.r.l. through your financial institution and quote the seven digits of the Client No. shown above.

Please note we do not accept Interac e-Transfers.

4. Cheque payments, please mail to :

For CAD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567C

PO Box 4567, Stn A

Toronto ON M5W 0J1

For USD Dollar (\$) Payments :

DELOITTE MANAGEMENT SERVICES LP

c/o T04567U

PO Box 4567, Stn A

Toronto ON M5W 0J1

**Appendix #1
Summary of Fees**

Name	Level	Hours	Rate	Amount
Sleeth, Jordan	Partner	16.7	725.00	12,107.50
Brown, Rose	Manager - Trust Accounting	18.3	350.00	6,405.00
Messina, Stephen	Senior	122.2	295.00	36,049.00
Conorton, Laura	Analyst	2.0	250.00	500.00
Dew, Todd	Senior	1.0	250.00	250.00
Total Professional Hours and Fees		160.2		55,311.50
Out-of-pocket Expenses				1,797.56
Accommodations - Hotel			653.75	
Records Storage Charges			118.26	
Transportation (e.g. mileage, taxi, public transit, tolls, parking - detail below)			1,025.55	
Mileage			735.34	
Parking			12.11	
Public Transport (Bus, Ferry, Train)			14.76	
Taxi/Rideshare			63.80	
Tolls/Road Charges			199.54	
Total Fees and Expenses (CAD)				57,109.06



Appendix #2

Work performed from October 29, 2023 to December 2, 2023

Date	Name	Narrative	Hours
10/29/2023	Sleeth, Jordan	Coordinate attendance by auctioneer re: electrical concerns; update to Clek re: lease assignment; update memo to R. English.	0.5
10/30/2023	Brown, Rose	Pull online report and reconciled and send to the Team.	0.4
10/31/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Prepare disbursement cheques.	0.5
10/31/2023	Messina, Stephen	On site at Kitchener client site. Conducted walkthrough with Real Estate Agent and electrician on safety protocols at 41 Ardelt during the removal process. Updated daily cashflow. Communicated with several customers on amounts owing.	5.5
11/1/2023	Sleeth, Jordan	Court Report - review prior reports, prepare outline for S. Messina.	1.0
11/1/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Input receipts.	0.5
11/3/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Input interest receipts and prepare disbursement cheque.	0.7
11/3/2023	Messina, Stephen	Updated daily cashflow and performed rollforward of R&D schedule to reconcile with month end.	2.5
11/6/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team and scan of mail rec'd.	0.3
11/6/2023	Messina, Stephen	Began a high-level draft of the Receivers second report. Updated daily cashflow. Drafted payments to pay HST remittances. Rolled forward the R&D to October 31, 2023.	5.8
11/6/2023	Sleeth, Jordan	Update discussions with S. Messina re: Rollstamp collections, asset removals post auction and electrician concerns; payment approvals.	0.5
11/7/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Prepare disbursement cheque.	0.7
11/7/2023	Messina, Stephen	Began drafting the Second Report of the Receiver. Updated daily cashflow and finalized ERV as at October 31, 2023. Rolled forward the resolution of the AarKel Holdback analysis.	6.7
11/7/2023	Sleeth, Jordan	Review AarKel W/C reconciliation and meeting agenda, provide comments to S. Messina; review HST filings.	0.4
11/8/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Prepare disbursement cheque.	0.9

Date	Name	Narrative	Hours
11/8/2023	Messina, Stephen	Drafting the Second Report of the Receiver. Drafted emails to resolve remaining issues with Rollstamp AR and the resolution of the AarKel Holdback.	7.0
11/9/2023	Brown, Rose	Scanning of mail rec'd and sent to Team.	0.1
11/9/2023	Messina, Stephen	Continued to draft the Second Report of the Receiver. Updated daily cashflow. Calculated the June bank reconciliation for upload of legacy accounts into Ascend. Discussed ongoing events at 41 Ardelt with auctioneer and staff.	7.5
11/9/2023	Sleeth, Jordan	Review landlord concerns re: asset removals, email to Corporate Assets re: same; review court report overview.	0.4
11/10/2023	Sleeth, Jordan	Review update memo to AarKel.	0.2
11/13/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Review and print Journal entries for processing to GL for May and June 2023.	1.3
11/13/2023	Messina, Stephen	On site at Kitchener location. Held discussion with auctioneer and rigging company to discuss electrical safety at the plant. Updated daily cashflow, updated accounts receivables and communicated with AarKel re receivables settlement. Second Report draft	8.0
11/14/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Prepare disbursement cheques.	0.7
11/14/2023	Messina, Stephen	Drafted the Second Report, updated the R&D to support the report to Oct 31, forecasted remaining collections and costs. Completed the July bank rec for movement of money into Ascend / trust account.	6.7
11/14/2023	Sleeth, Jordan	Review update to landlord re: asset removals, discuss same with S. Messina; call with CRA and W. Van Alphen re; trust audits.	1.6
11/15/2023	Messina, Stephen	Completed the first draft of the Second report. Updated daily cashflows, communicated with previous millwright to retain on a temp basis, released rental forklift.	7.3
11/15/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Prepare disbursement cheques. Prepare deposit and take to the bank.	1.0
11/16/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Input Deposit entries.	0.5
11/16/2023	Messina, Stephen	Review cash flows and update same; calls with Auctioneer and Landlord representative; process payments, receive update from S. Montoux re: site issues (locks).	4.7
11/17/2023	Messina, Stephen	Updated bank reconciliations to complete transfer of funds into ascend, updated daily banking	3.0
11/17/2023	Brown, Rose	Scan mail rec'd and sent to Team.	0.1

Date	Name	Narrative	Hours
11/17/2023	Dew, Todd	Bank reconciliations	1.0
11/17/2023	Sleeth, Jordan	Email to Rollstamp re: settlement payment.	0.3
11/20/2023	Messina, Stephen	Updated daily cashflow, coordinated the movement of money from debtor to trust accounts, communicated with auctioneer	3.4
11/20/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Input Deposit entries. Scanning of Receipts and Disbursements issued for last week and file/save on Q Drive. Discuss JE with SM.	1.2
11/20/2023	Sleeth, Jordan	Review invoices and approve payment.	0.2
11/21/2023	Conorton, Laura	Processing deposits, reports. Preparation of wire to 41 Ardelt	1.1
11/21/2023	Messina, Stephen	Updated daily cashflow, compiled relevant information to support movement of funds to trust accounts	2.7
11/22/2023	Brown, Rose	Discuss and Set up Receipt and Disbursement vouchers on Q Drive for JE support - companies account.	1.0
11/22/2023	Messina, Stephen	Review daily cashflow, settle up AR with AarKel, trace invoices and support for money moved in / our of the debtor account	3.4
11/22/2023	Sleeth, Jordan	Clek lease assignment - update to Clek	0.2
11/23/2023	Brown, Rose	Pull online report and reconcile to Ascend and send to the Team. Input Receipt voucher into Ascend.	0.7
11/23/2023	Messina, Stephen	Received boxes pertaining to the Windsor operation and began sorting through the information to support future HST audits and movement of money to Trust account.	3.5
11/24/2023	Messina, Stephen	Sorted through physical documents for all relevant support in the event of an HST audit over the operations over Receivership period. Updated daily cashflow.	8.2
11/24/2023	Brown, Rose	Update Ascend with Company account Receipts and disbursements.	4.0
11/26/2023	Sleeth, Jordan	Review distribution report draft and provide revisions.	1.2
11/27/2023	Conorton, Laura	Processing, recording and completion of wire to 41 Ardelt for Nov rent	0.4
11/27/2023	Brown, Rose	Trust Banking - Pull online report and reconcile to Ascend and send to the Team. Input Receipt voucher into Ascend. Update Ascend with Company account Receipts and disbursements US\$ account.	1.8
11/27/2023	Messina, Stephen	Sorted through physical documents for all relevant support in the event of an HST audit over the operations over Receivership period. Provided boxes to Iron Mountain for safekeeping. Drafted S246 Reciever Update	8.9

Date	Name	Narrative	Hours
11/27/2023	Sleeth, Jordan	Review distribution report draft and provide revisions, discuss with S. Messina; review CRA letter and expenses.	1.5
11/27/2023	Sleeth, Jordan	Clek lease assignment - review draft assignment agreement, liaise with R. Danter.	0.2
11/28/2023	Conorton, Laura	Processing cheque payment to Enova	0.5
11/28/2023	Brown, Rose	Review and Input adjusted Receipt voucher into Ascend.	0.4
11/28/2023	Messina, Stephen	Deal with suppliers/leasing company over the phone, compile records for the bank account migration and CRA audit, applied comments on S246 reports, updated R&D for S246, filed HST returns for October incl adjustments	7.1
11/28/2023	Sleeth, Jordan	Review distribution report draft and provide revisions, discuss with S. Messina, review s. 246 report and provide revisions.	0.8
11/29/2023	Messina, Stephen	Finalized S246 reports for ITI, MPI and MHI estates. Assessed physical records and discussed with team on approach to suffice CRA queries in connection with the refund, held discussion with various suppliers including ADP.	7.3
11/29/2023	Brown, Rose	Trust Banking - Pull online report and reconcile to Ascend and send to the Team.	0.2
11/29/2023	Sleeth, Jordan	Review updated s. 246 reports	0.5
11/30/2023	Brown, Rose	Update Ascend with Moldco Company accounts Receipts and disbursements CDN/US\$ account.	1.1
11/30/2023	Messina, Stephen	On site at Kitchener facility to discuss exit with auctioneer, finalized S246 reports, emails and calls with various suppliers and customers, updated second report of receiver	7.8
11/30/2023	Sleeth, Jordan	Final review of s. 246 reports	0.3
11/30/2023	Sleeth, Jordan	Attend at 41 Ardelt with Coporate Assets re: site status, emails to landlord re: timing to vacate; review and revise Receiver report, discussions with S. Messina re: same.	5.8
12/1/2023	Brown, Rose	Trust Banking - Pull online report and reconcile to Ascend and send to the Team.	0.2
12/1/2023	Messina, Stephen	Updated ERV to correspond with second report update, communicated with remaining customers, paid remaining suppliers, updated service list	5.2
12/2/2023	Sleeth, Jordan	Review Receiver's second report, make revisions, email to S. Messina re: same.	1.1
Total			160.2

This is Exhibit "C" referred to in the Affidavit of Jordan Sleeth sworn December 20, 2023

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke.

Commissioner for Taking Affidavits (or as may be)

Exhibit "C"

In the matter of the receivership of Injection Technologies Inc., Moldco Plastics Inc. and Moldco Holdings Inc. (the "Debtors")

Billing rates of Deloitte professionals.
For the period May 24 to December 2, 2023

Name	Level	Rate
Sleeth, Jordan	Partner	725.00
Zajko, Lisa	Partner	725.00
Keeble, Jeff	Partner	725.00
Damiani, Stefano	Director	605.00
van Alphen, Wendy	Senior Manager - Contractor	525.00
Khemani, Bharat	Manager	475.00
Brown, Rose	Manager - Trust Accounting	350.00
O'Neill, Sandi	Manager - Consultant	350.00
Messina, Stephen	Senior	295.00
Cestnick, Winston	Analyst	250.00
Conorton, Laura	Analyst	250.00
Alleyne, Jaylon	Analyst	250.00
Casey, Brian	Senior Manager - Data Preservation	525.00
Garcia, Andy	Analyst - Data Preservation	250.00
Gulve, Sonali	Analyst	250.00
Dew, Todd	Senior	250.00
Pardinas, Elijah	Senior	250.00

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No.: CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

Proceeding commenced at
Toronto, Ontario

**AFFIDAVIT OF JORDEN SLEETH
(Sworn December 20, 2023)**

HARRISON PENZA LLP

Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, ON N6A 5R2

Timothy C. Hogan (LSO #36553S)

Robert Danter (LSO #69806O)

Tel: 416.597.4303

Fax: 416.595.8695

Email: thogan@harrisonpensa.com

rdanter@harrisonpensa.com

Lawyers for the Receiver
Deloitte Restructuring Inc.

APPENDIX "M"

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

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

- and -

**INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC., AND MOLDCO HOLDINGS
INC.**

Respondents

**APPLICATION UNDER SUBSECTIONS 47(1) AND 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**

**FEE AFFIDAVIT OF MATILDA LICCI
(sworn December 20, 2023)**

I, **MATILDA LICCI**, of the City of Toronto, in the Province of Ontario, **MAKE OATH AND SAY
AS FOLLOWS:**

1. I am an associate at Aird & Berlis LLP and, as such, I have knowledge of the matters to which I hereinafter depose.
2. Aird & Berlis LLP has acted, and continues to act, as counsel for Deloitte Restructuring Inc. in its capacity as Court-appointed receiver and manager (in such capacity, the “**Receiver**”), without security, of all of the assets, undertakings and properties of Injection Technologies Inc., Moldco Plastics Inc., and Moldco Holdings Inc. (collectively, the “**Debtors**”).
3. Aird & Berlis LLP has prepared statements of account and reports in connection with its mandate as counsel to the Applicant, detailing its service rendered and disbursements incurred, namely:
 - (a) an account dated July 31, 2023 in the amount of \$61,897.33 in respect of the period from June 1, 2023 to July 31, 2023;

- (b) an account dated September 30, 2023 in the amount of \$70,155.49 in respect of the period from August 1, 2023 to September 30, 2023;
- (c) an account dated November 30, 2023 in the amount of \$1,395.55 in respect of the period from October 1, 2023 to November 3, 2023; and
- (d) a report evidencing fees in the amount of \$29,948.86 in respect of the period from May 29, 2023 to September 22, 2023,

(collectively, the “**Statements of Account**”).

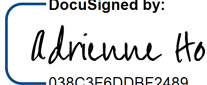
Attached hereto and marked as **Exhibit “A”** to this Affidavit are copies of the Statements of Account. The average hourly rate of Aird & Berlis LLP is \$535.48.

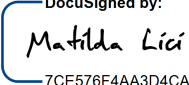
4. Attached hereto and marked as **Exhibit “B”** to this Affidavit is a chart detailing the lawyers, law clerks and articling students who have worked on this matter.

5. Assuming this Honourable Court grants an order discharging the Receiver and there is no opposition to the Order, the anticipated legal fees, exclusive of taxes and disbursements, to the discharge of the Receiver are anticipated to be \$7,500.00.

6. This Affidavit is made in support of a motion to, *inter alia*, approve the attached Statements of Account of Aird & Berlis LLP and the fees and disbursements detailed therein, and for no improper purpose whatsoever.

SWORN before me by video conference at)
 the City of Toronto, in the Province of)
 Ontario, this 20th day of December, 2023, in)
 accordance with O. Reg. 431/20,)
 Administering Oath or Declaration Remotely)

DocuSigned by:)
)
 038C3F6DDBF2489...)
 _____)
 A commissioner, etc.)
 Adrienne Ho)

DocuSigned by:)
)
 7CE576F4AA3D4CA...)
 _____)
MATILDA LICCI)

Attached is Exhibit "A"

Referred to in the
AFFIDAVIT OF MATILDA LICI

Sworn before me
this 20th day of December, 2023

DocuSigned by:
Adrienne Ho
038C3F6DDBF2489...

Adrienne Ho

A commissioner, etc



Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
 Toronto, Ontario M5J 2T9 Canada

T 416 863 1500
 F 416 863 1515
 airdberlis.com

Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

July 31, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1348064

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending July 31, 2023

Total Fees	\$54,735.00
Total Disbursements	41.40
Total Taxes	7,120.93
Amount Due	\$61,897.33 CAD

Payment Information

Payment by Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

Payment by Cheque:

Payable To:
 Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
 Toronto, ON M5J 2T9

Email notification for EFT and WIRE payments: accounting@airdberlis.com

Payment is due on receipt.

Please quote our Matter No. and the invoice number(s) to ensure correct allocation of payment.

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS INVOICE IS DELIVERED.

GST / HST Registration # [REDACTED]

* For legal services provided to clients residing in British Columbia, Quebec, Manitoba and Saskatchewan, clients are advised to self-assess provincial sales tax on fees and disbursements charged.



Aird & Berlis LLP
Brookfield Place, Suite 1800
181 Bay Street
Toronto, Ontario M5J 2T9 Canada

T 416 863 1500
F 416 863 1515
airdberlis.com

Deloitte Restructuring Inc.
8 Adelaide St W #200
Toronto, Ontario
M5H 0A9 Canada

July 31, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1348064

Re: Receiver of Injection Technologies Inc.

Client No: 013945
Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending July 31, 2023

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
ML	01/06/23	395.00	1.60	632.00	Review agreement for return of tools and equipment and reporting email to J. Sleeth re same; Review contract for insolvency termination notice and report to J. Sleeth et al
ML	02/06/23	395.00	0.40	158.00	Email to R. English re precedent for auctioneer agreement
ML	04/06/23	395.00	0.20	79.00	Revise CLEK letter and email to S. Damiani re same
ML	05/06/23	395.00	0.20	79.00	Locate precedent for supply agreement
ML	06/06/23	395.00	1.30	513.50	Emails with R. English and S. Damiani re terminating CLEK lease; Call with Deloitte and TD re receivership updates; Call with S. Damiani, W. van Alphen and J. Yantzi re tryout agreements
ML	07/06/23	395.00	2.60	1,027.00	Call with R. English re draft documents; Draft Acknowledgement and Indemnity and email to R. English re same
ML	08/06/23	395.00	0.20	79.00	Email to S. Damiani re resin acknowledgement and indemnity; Email to W. van Alphen re resin acknowledgement
ML	09/06/23	395.00	0.10	39.50	Update service list and email to T. Hogan and S. Damiani re same
IS	13/06/23	315.00	6.10	1,921.50	Researching rights and obligations of receiver in a sublease agreement; Preparation of research review for M. Lici regarding same

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
ML	13/06/23	395.00	2.50	987.50	Call with J. Sleeth and W. van Alphen re Clek; Instructions re research on terminating sublease; Review research memo re receiver's ability to terminate lease; Review Clek letter and email to S. Damiani re same
KBP	14/06/23	650.00	1.70	1,105.00	Attend strategy calls with client team regarding administrative matters and lease assignment and customers.
ML	14/06/23	395.00	3.40	1,343.00	Call with W. van Alphen and S. Damiani; Draft tryout acknowledgement and indemnity agreement
ML	15/06/23	395.00	0.70	276.50	Email to S. Damiani re tryout agreement; Call with R. English and J. Yantzi re status updates; Begin drafting agreements re continuing production
KBP	16/06/23	650.00	1.00	650.00	Attend calls with J. Sleeth to discuss lease assignment and global settlement terms; email exchanges with client team regarding supplier issues.
ML	16/06/23	395.00	1.40	553.00	Revise tryout agreement; Continue drafting agreements re continuing production
KBP	18/06/23	650.00	0.50	325.00	Email exchange with client team regarding lease matters and try-out forms.
ML	18/06/23	395.00	2.50	987.50	Prepare draft notice letter and draft production agreement and email to R. English re same
KBP	19/06/23	650.00	0.40	260.00	Email exchange with client team regarding releases and tryouts;
ML	19/06/23	395.00	1.80	711.00	Review and revise production agreements and email to clients re same; Call with R. English and J. Yantzi re file updates; Review and revise tryout agreement and email to K. Plunkett and R. English re same; Further revise tryout agreement and email to W. van Alphen re same; Call with W. van Alphen re amendments to tryout agreement and reporting email to K. Plunkett and R. English re same
ML	20/06/23	395.00	1.20	474.00	Conference call with Deloitte and TD re receivership updates; Revise Service List and email same to Deloitte and T. Hogan
DRE	21/06/23	950.00	2.00	1,900.00	Receive insurance policy and notice of non-renewal; Telephone calls with Deloitte; Review policy; Consult with John Longo; Instruct re research; Set up conference call for June 22, 2023

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
JJL	21/06/23	850.00	1.80	1,530.00	Review emails from R. English regarding issues concerning expiration of insurance policy; Review insurance policy in issue and discussion with R. English regarding same, etc.
ABF	22/06/23	315.00	2.00	630.00	Research re Insurance Act (Ontario) for D. Robb English
DRE	22/06/23	950.00	2.00	1,900.00	Deal with supplier issues; Research on insurance issues; Instruct student; Consult with J. Longo
JJL	22/06/23	850.00	0.30	255.00	Further review of policy and Insurance Act regarding non-renewal issue; Discussion with R. English regarding same
ML	22/06/23	395.00	0.50	197.50	Revise production agreement and email to R. English re same; Further review agreement per comments from R. English and email to W. van Alphen re same
JY	23/06/23	425.00	2.00	850.00	Review and consider the receiver's comments on the draft form of asset purchase agreement; telephone call with the receiver; confer with M. Lici; revise draft form of asset purchase agreement
ML	23/06/23	395.00	0.30	118.50	Call with J. Yantzi and Deloitte re APA
ML	28/06/23	395.00	0.40	158.00	Organize documents re equipment leases
MP	29/06/23	515.00	0.50	257.50	Review of correspondence re Windsor lease; initial review of same; email to R. English re same; instructions to S. Lima re pulling title to Windsor property
DRE	30/06/23	950.00	0.50	475.00	Dealing with Landlord issues
ML	30/06/23	395.00	2.00	790.00	Call with R. English and Deloitte re amendments to APA; Review and revise APA as per call with Deloitte and reporting email to R. English re same; Email to Deloitte re revised APA
MP	30/06/23	515.00	3.30	1,699.50	Review of latest correspondence re leased property; call with R. English re same; conducting review of lease and purchase documents; preparing report re same; reporting email to Deloitte re same; review of correspondence from Deloitte re contact with landlord's counsel or landlord's agent
SL	30/06/23	215.00	0.20	43.00	Retrieved parcel register.
ML	04/07/23	395.00	1.10	434.50	Email to Loopstra Nixon enclosing updated APA; Review and revise Lucid settlement agreement and email to Deloitte re same

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
MP	05/07/23	515.00	1.00	515.00	Review of correspondence from Deloitte; review of lease re insurance and related matters; email to Deloitte re comments on lease
ML	06/07/23	395.00	1.90	750.50	Consider whether to allow or facilitate contact with landlord and discussion with S. Mitra re same, and report to R. English re same; Email to Deloitte re communications between landlord and prospective bidder; Research re whether occurrence of receivership constitutes event of default
MP	06/07/23	515.00	0.80	412.00	Review of correspondence from Deloitte re lease and receivership matters and contact with landlord; internal call with M. Lici; email to Deloitte re same; email to landlord's counsel re assignment and assumption agreement
ML	07/07/23	395.00	1.10	434.50	Email to R. English re receivership and tenant allowance under lease agreement; Research and email to clients re enforcement of receivership default provision in lease agreement; Email to R. English re receivership as event of default
MP	07/07/23	515.00	0.60	309.00	Correspondence from M. Lici; email from R. English; correspondence to M. Lici re comments re tenant allowance; emails from R. English re same; contact with landlord's counsel re engagement; email to client re same
ML	10/07/23	395.00	1.30	513.50	Conference call with TD, Deloitte and R. English re status update and next steps; Call with R. English and email to clients re tenant allowance under lease
MP	10/07/23	515.00	2.30	1,184.50	Drafting landlord consent and assignment agreement re Injection Technologies; correspondence with R. English; internal call with R. English and M. Lici; preparing revised draft of assignment agreement; email to R. English re same; email to landlord's counsel
DRE	12/07/23	950.00	2.50	2,375.00	Conference call with Deloitte; Review offers received and discuss responses; Set up TD call; Conference call with TD to review offers; Discussions on terms of LL consent
ML	12/07/23	395.00	0.70	276.50	Organize bid documents and conference call with Deloitte, R. English and J. Yantzi re bids
MP	12/07/23	515.00	0.30	154.50	Review of bid; internal email to R. English re same
ML	14/07/23	395.00	0.30	118.50	Call with Deloitte and TD re status update re bids

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
MP	14/07/23	515.00	0.40	206.00	Review of correspondence re Injection Technologies lease; follow up email to landlord's counsel; email to client re update re same; review of R. English re existing bids
MP	17/07/23	515.00	0.50	257.50	Correspondence with R. English re Injection Technologies lease; review of correspondence from Deloitte team; email from landlord's counsel re cure costs and review of invoices;
DRE	18/07/23	950.00	1.50	1,425.00	Assist Receiver with tooling issues and with customer issues; Deal with landlord issues; Review and discuss offers; Connect with T. Hogan; Telephone call to E. Feige
ML	18/07/23	395.00	2.50	987.50	Review and revise Release for Auto Systems and email to Deloitte re same; Begin revising Release for Mitchell Plastics
DRE	19/07/23	950.00	1.50	1,425.00	Conference call with T. Hogan re BMO issues' Review offers; Instruct team re changes needed to Aarkel offer; Set up call
DRE	19/07/23	950.00	0.40	380.00	Instruct J. Yantzi re changes to APA
DRE	19/07/23	950.00	1.00	950.00	Conference call with Deloitte and T. Hogan; Instruct J. Yantzi re terms of APA to change; Review offer profiles
ML	19/07/23	395.00	0.90	355.50	Review and revise Release for Mitchell Plastics and email to R. English re same; Email to Deloitte re Mitchell Plastics Release
DRE	20/07/23	950.00	2.00	1,900.00	Conference call re terms of APA; Telephone calls from J. Yantzi to discuss terms; Review revised APA; Telephone calls with Deloitte; Conference call with TD and Deloitte; Telephone call with E. Feige
MP	20/07/23	515.00	0.10	51.50	Correspondence from Deloitte; call with R. English re status of transaction and lease assignment
DRE	21/07/23	950.00	1.50	1,425.00	Telephone call with TD; Negotiate APA terms; Deal with sale of some molds; Telephone call to E. Feige; Update TD; Comments from S. Damiani and J. Sleeth; Instruct M. Cappabianca
ML	21/07/23	395.00	1.00	395.00	Call with J. Yantzi re sale approval; Email from Deloitte and call with W. van Alphen re need for Bill of Sale; Review and revise PEP Release and Settlement Agreement
DRE	22/07/23	950.00	0.70	665.00	Review revised APA; Comment and revise; Instruct M. Cappabianca, Letters with Deloitte

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
ML	23/07/23	395.00	1.70	671.50	Review and revise production discontinuation notice letter and email to R. English re same
DRE	24/07/23	950.00	1.50	1,425.00	Review mold release document; Conference call with Deloitte; Review lease issues; Review changes to APA; Consult with M. Pedro and M. Lici; Contact Loopstra; Follow up with E. Feige; Follow up on Corp assets and Aarkel offers; Schedule TD call
MAM	24/07/23	750.00	0.50	375.00	Correspond with M. Pedro; Review previous research on HST applicable to tenant realty tax payments; Review government resources; Update case-law; Draft correspondence to M. Pedro
MP	24/07/23	515.00	0.40	206.00	Correspondence from Deloitte; review of lease re HST and additional rent and property taxes; email to client re same re lease provisions; email to M. Muskrat re same
DRE	25/07/23	950.00	1.20	1,140.00	Re-work APA re employees and wind down; Telephone call with E. Feige; Letters to Deloitte updating; Review and revise APA
ML	25/07/23	395.00	0.90	355.50	Call with TD, Deloitte and A&B to review and assess bids
DRE	26/07/23	950.00	3.00	2,850.00	Deal with APA, tooling release issues; Revisions, negotiation with purchaser counsel and further revisions
ML	26/07/23	395.00	0.90	355.50	Review and revise Skyjack release and email to R. English re same; Review APA provision re continued access for Receiver post-closing
DRE	27/07/23	950.00	2.00	1,900.00	Telephone calls with Deloitte; Revise offer; Instruct associate; Telephone calls with E. Feige (2); Review terms and issues re landlord
ML	27/07/23	395.00	0.50	197.50	Review and revise Skyjack release and email to S. Damiani re same
DRE	28/07/23	950.00	2.50	2,375.00	Exchange signed APA's; Instruct associate; Secure court dates; Deal with BMO consent; Secure court date and confirm with all
ML	28/07/23	395.00	0.80	316.00	Correspondence with Commercial List re hearing date for AVO; Instructions re motion record; Emails with receiver's independent counsel and purchaser's counsel to canvass hearing date; Prepare hearing request form and email to Commercial List to secure date
DRE	31/07/23	950.00	1.50	1,425.00	Deal with purchaser request; Revising releases; Update on conditions; Update from J. Sleeth

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
ML	31/07/23	395.00	0.60	237.00	Review and revise notice letter to Kitchener employees and email to S. Damiani re same
TOTAL:			93.50	\$54,735.00	

Name	Year of Call	Title	Hours	Rate	Value
Bernicchia-Freeman, Alex (ABF)		Student	2.00	\$315.00	\$630.00
English, D. Robb (DRE)	1980	Partner	27.30	\$950.00	\$25,935.00
Lici, Matilda (ML)	2020	Associate	39.50	\$395.00	\$15,602.50
Lima, Sarah (SL)		Law Clerk	0.20	\$215.00	\$43.00
Longo, John J. (JJL)	1989	Partner	2.10	\$850.00	\$1,785.00
Muskat, Melissa A (MAM)	1990	Partner	0.50	\$750.00	\$375.00
Pedro, Mario (MP)	2016	Partner	10.20	\$515.00	\$5,253.00
Plunkett, Kyle B. (KBP)	2011	Partner	3.60	\$650.00	\$2,340.00
Spiliakos, Isabella (IS)		Student	6.10	\$315.00	\$1,921.50
Yantzi, Jonathan (JY)	2019	Associate	2.00	\$425.00	\$850.00

OUR FEE \$54,735.00
 HST @ 13% 7,115.55

DISBURSEMENTS

Taxable Disbursements

Teraview Search	41.40
Total Taxable Disbursements	\$41.40
HST @ 13%	5.38

AMOUNT DUE

\$61,897.33 CAD

THIS IS OUR INVOICE HEREIN
 AIRD & BERLIS LLP



D. Robb English

E.&O.E.

Payment Information

Payment by Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

Payment by Cheque:

Payable To:
Aird & Berlis LLP
Brookfield Place, Suite 1800
181 Bay Street
Toronto, ON M5J 2T9

Email notification for EFT and WIRE payments: accounting@airdberlis.com

Payment is due on receipt.

Please quote our Matter No. and the invoice number(s) to ensure correct allocation of payment.

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS INVOICE IS DELIVERED.

GST / HST Registration # [REDACTED]

* For legal services provided to clients residing in British Columbia, Quebec, Manitoba and Saskatchewan, clients are advised to self-assess provincial sales tax on fees and disbursements charged.



Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
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T 416 863 1500
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 airdberlis.com

Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

July 31, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1348064

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

REMITTANCE SLIP

Total Fees	\$54,735.00
Total Taxable Disbursements	41.40
Total Taxes	7,120.93

AMOUNT DUE \$61,897.33 CAD

Payment Information

Payment by Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

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GST / HST Registration # [REDACTED]

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Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

September 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1355130

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending September 29, 2023

Total Fees	\$62,084.50
Total Taxes	8,070.99
Amount Due	\$70,155.49 CAD

Payment Information

Payment by Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

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GST / HST Registration # [REDACTED]

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Deloitte Restructuring Inc.
8 Adelaide St W #200
Toronto, Ontario
M5H 0A9 Canada

September 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1355130

Re: Receiver of Injection Technologies Inc.

Client No: 013945
Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending September 29, 2023

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
ML	24/07/23	395.00	2.50	987.50	Revise notice letter and email to W. van Alphen re same; Call with R. English and Deloitte re notice letter; Revise notice letter accordingly and email to Deloitte re same; Review and revise notice letter re obsolete and abandoned tools and email to R. English re same; Email to W. van Alphen re notice letter; Review obsolete tool agreement;
MP	25/07/23	515.00	0.50	257.50	Review of email from M. Muskrat; review of lease; email to Deloitte re HST on property taxes
MP	31/07/23	515.00	1.40	721.00	Review of lease re operational matters and landlord constructions rights; preparing email to client group
DRE	01/08/23	950.00	2.50	2,375.00	Review file and consult with J. Sleeth
ML	01/08/23	395.00	0.90	355.50	Call with Deloitte, R. English and M. Pedro re landlord issues; Draft AVO
MP	01/08/23	515.00	2.90	1,493.50	Completing review of Kitchener lease re access issues; review of site and block map of property; reporting email to client re business operations at site and tenant remedy options; email to landlord's counsel re call to discuss; email to R. English re lease assignment for Windsor leased location; call with client to discuss lease matters; preparing revised draft of landlord consent assignment and circulating same to client and landlord's counsel; email to Deloitte re same; email to M. Cappabianca
DRE	02/08/23	950.00	2.50	2,375.00	Update on sale conditions; Update from J. Sleeth

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
MP	02/08/23	515.00	1.70	875.50	Correspondence with R. English and M. Cappabianca re cure costs and APA: review of Deloitte email re same; review of correspondence from Deloitte; arranging call with landlord's counsel; email to Deloitte re cure costs
MP	03/08/23	515.00	1.70	875.50	Call with counsel for Aarkel re 4350 Industrial lease; call with landlord's counsel; reporting email to client re same; email to counsel for Aarkel re assignment and call with landlord's counsel; email to landlord's counsel re assignee entity
MP	04/08/23	515.00	0.30	154.50	Call with S. Damiano re 4350 Industrial Drive matters
ML	08/08/23	395.00	0.10	39.50	Emails re conference call between parties
MP	08/08/23	515.00	0.80	412.00	Correspondence with S. Damiano; call with S. Damiano; email to R. English re status of lease matters
DRE	09/08/23	950.00	1.00	950.00	Updates from Deloitte; Follow up re landlord issues; Cluthe issues
ML	09/08/23	395.00	4.30	1,698.50	Call with Deloitte and TD re status updates; Draft NOM and Order for motion for court approval of sale
MP	09/08/23	515.00	0.50	257.50	Review of correspondence from client; email to client re same; email and call from purchaser's counsel; email to purchaser's counsel re Windsor assignment matters
DRE	10/08/23	950.00	1.50	1,425.00	Discussion with M. Pedro; Telephone call from E. Feige; Update status of court documents; Instruct M. Lisi; Instruct M. Cappabianca and J. Yantzi; Telephone call with J. Sleeth
ML	10/08/23	395.00	3.30	1,303.50	Draft Order for motion to approve transaction; Research and draft factum for motion for court approval and reporting email to R. English re same
MP	10/08/23	515.00	2.60	1,339.00	Review of closing agenda; comments to M. Cappabianca re same; call with R. English re lease matters; follow up with client re Kitchener lease matters; email to client re same; email to S. Damiano re Windsor Lease; all party call with landlord and landlord's counsel; reporting email to client re same
DRE	11/08/23	950.00	2.00	1,900.00	Review and revise court materials; Review Cluthe documents and share with T. Hogan; Receive and review additional Cluthe documents; Update on landlord negotiation

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
DRE	11/08/23	950.00	0.40	380.00	Follow up for Receiver report; Update landlord status with M. Pedro
DRE	14/08/23	950.00	1.50	1,425.00	Review and comment on receiver's report; Receive comments on closing documents; Messages to T. Hogan, etc.
MP	14/08/23	515.00	0.30	154.50	Review of comments / draft from landlord's counsel
DRE	15/08/23	950.00	2.30	2,185.00	Deal with Cluthe claim; Review draft NOM; Review draft orders; Review final Deloitte report; Consult with T. Hogan; Instruct J. Yantzi and team; Review landlord issues; Review proposed changes from Windsor landlords; Connect with E. Feige and M. Pedro
MP	15/08/23	515.00	2.50	1,287.50	Email to R. English re same; email to opposing counsel re landlord contact details; review of revised draft of assignment from landlord's counsel; correspondence with M. Cappabianca; email to client re Ambassador Drive lease; email to Aarkels' counsel re Ambassador Drive assignment; preparing revised draft of landlord consent to 4350 Industrial Drive and email to client; email to Aarkel counsel re 4350 Industrial Drive
DRE	16/08/23	950.00	2.50	2,375.00	Discuss lease situation with M. Pedro; Telephone call with E. Feige; Review assignment document; Discuss closing arrangements with M. Cappabianca; Schedule M. Spence for hearing; Telephone call with E. Weidberg; Schedule an all counsel call re lease assignment
MP	16/08/23	515.00	0.50	257.50	Correspondence from S. Damiano re 2051 Ambassador Drive assignment; call with R. English re 4350 Industrial Drive lease matters
DRE	17/08/23	950.00	2.20	2,090.00	Instruct J. Yantzi re APA and issues on tooling; Conference call with E. Feige and E. Weidberg; Conference call with Deloitte team; Outline process for dealing with tools and resin
MP	17/08/23	515.00	0.20	103.00	Review of correspondence and instructions from S. Damiano; correspondence with R. English
DRE	18/08/23	950.00	2.00	1,900.00	Deal with landlord issue; Deal with motion and closing
MP	18/08/23	515.00	0.30	154.50	Correspondence with R. English; email to E. Weidberg enclosing revised cost schedule
DRE	21/08/23	950.00	2.00	1,900.00	Deal with various landlord issues; Negotiate forms of consent; Telephone calls; Instruct M. Pedro


MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
MP	21/08/23	515.00	2.70	1,390.50	Email to Ed Weidberg re revised draft of consent and cure cost calculation; review of correspondence with E. Feige; email to E. English re discussions with 2051 Ambassador Drive landlord; call with Mousseau Law; call to Fiorgi Zorzi LLP; revising draft of 2051 Ambassador Drive consent; email to client re Mousseau Law and revised consent; review of revised draft of consent from Loopstra Nixon; correspondence with R. English re same; email to Loopstra Nixon; email to landlord's counsel; email to client; email to R. English; correspondence with Loopstra Nixon; email to Ed Weidberg;
DRE	22/08/23	950.00	1.00	950.00	Deal with landlord issues
MP	22/08/23	515.00	3.70	1,905.50	Correspondence with 4350 Industrial Drive landlord counsel re call; email to client re confirmation on revised draft of 2051 Ambassador Drive consent; email to Aarkel counsel re 2051 Ambassador Drive; call with G. Fung of Loopstra Nixon; review of further revised draft re 4350 Industrial Drive; call with landlord's counsel and Loopstra Nixon; emails to R. English re rent reconciliations and APS and updated re closing out consent
DRE	23/08/23	950.00	2.00	1,900.00	Continuing to deal with landlord issues; Finalize consents; Instruct J. Yantzi and M. Pedro; Update call with J. Sleeth
MP	23/08/23	515.00	1.60	824.00	Preparing revised draft of consent; emails to G. Fung re same with comments; emails to R. English; email to E. Weidberg enclosing draft; email to L. Beneteau enclosing draft and comments; correspondence with client re HVAC matters at site; emails from client re same
DRE	24/08/23	950.00	0.80	760.00	Telephone call with Deloitte x2; Update landlord issues with M. Pedro
MP	24/08/23	515.00	2.30	1,184.50	Correspondence from J. Sleeth; email to R. English re execution of 4350 Industrial Drive consent; email to client re execution and payment of rent; email to R. English re logistics and status; email to G. Fong re invoices for rent; review of comments from J. Sleeth and return comments; email to M. Cappabianca re closing documents; email to L. Beneteau; correspondence re payment of legal fees; email to R. English re same; emails to client; emails to landlord's counsel re rent invoices

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
DRE	25/08/23	950.00	1.50	1,425.00	Review first draft AR sale document; Review landlord consent status; Consult with J. Sleeth on Aarkel pre closing requests and Rollstamp issue
MP	25/08/23	515.00	1.40	721.00	Review of updated invoices; email to client re same; email to Aarkel's counsel and landlord's counsel re same; email to client re execution; email to G. Fung re HVAC repair re 4350 Industrial Drive; preparing mutual undertaking to readjustment; email to G. Fung re same
DRE	28/08/23	950.00	1.50	1,425.00	Deal with Rollstamp issue; Deal with customer owned tooling/resin issues; Instruct re AR sale agreement
MP	28/08/23	515.00	0.70	360.50	Correspondence with client re evidence of payment of rent arrears; emails to G. Fung re same; further follow up with client re same; correspondence with G. Fung
DRE	29/08/23	950.00	1.00	950.00	Telephone calls, consult with team and closing preparation
MP	29/08/23	515.00	0.40	206.00	Review of cheque re payment of outstanding rent; emails with J Sleeth re same; compiling consent for 2051 Ambassador Drive
DRE	30/08/23	950.00	1.40	1,330.00	Conference call with team to review closing status and revised agenda; Telephone call with J. Sleeth; Discussion with purchaser counsel re form of conveyance for BMO equipment
MP	30/08/23	515.00	1.00	515.00	Correspondence with M. Cappabianca re outstanding real estate items for closing; review of revised closing agenda; call with R. English and M. Cappabianca re closing matters; emails to M. Cappabianca re closing items; review of revised insurance certificate from E. Wiedberg re 4350 Industrial Drive location
DRE	31/08/23	950.00	0.80	760.00	Prepare for closing and instruct
MP	31/08/23	515.00	0.40	206.00	Review of revised draft of mutual undertaking; emails with G. Fung re same
DRE	01/09/23	950.00	1.50	1,425.00	Telephone call with Deloitte; Letter issues arise over equipment said to have been removed
ML	01/09/23	395.00	0.30	118.50	Conference call with R. English, M. Cappabianca and Deloitte re sale transaction
MP	01/09/23	515.00	0.80	412.00	Review of statement of adjustments; email to M. Cappabianca re same; email to client re 4350 cure costs and rent reconciliation statements; email to G. Fung re same

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
DRE	05/09/23	950.00	1.50	1,425.00	Conference call with parties re moved equipment issue; Receive last minute comments re HST election; Deal with A/R sale calls with Deloitte; Instruct M. Cappabianca
ML	05/09/23	395.00	0.40	158.00	Call with AarKel counsel, R. English and Deloitte re transaction
MP	05/09/23	515.00	0.40	206.00	Correspondence to G. Fung re payment of cure costs; correspondence with M. Cappabianca re closing documents
DRE	06/09/23	950.00	2.00	1,900.00	Deal with issues concerning tax liabilities and indemnity; Deal with closing issues, Instruct re receiver's certificate; Telephone call with J. Sleeth; Instruct M. Lisi; Instruct M. Cappabianca; Instruct re AR sale agreement; Confirm closing
ML	06/09/23	395.00	0.80	316.00	Prepare draft Receiver's Certificate and email to client re same; Set up DocuSign for execution of Certificate; Email to purchaser enclosing signed Certificate; Instructions re filing with Court; Draft email to Service List re Certificate
PLW	06/09/23	255.00	0.40	102.00	Submitted Receivers Certificate for filing online with the court
DRE	07/09/23	950.00	0.80	760.00	Deal with receiver's certificate filing and review and revise AR sale document
DRE	08/09/23	950.00	0.50	475.00	Proof AR sale documents
ML	12/09/23	395.00	0.20	79.00	Email to Service List re issued Certificate of Receiver
DRE	14/09/23	950.00	0.50	475.00	Follow up on AR APS and with J. Sleeth
DRE	19/09/23	950.00	1.00	950.00	Consult with J. Sleeth re outstanding items; Telephone call with E. Feige
DRE	20/09/23	950.00	0.60	570.00	Follow up on AR sale and exchange with Deloitte
DRE	25/09/23	950.00	0.50	475.00	Completion of AR and inventory sale; Letter from grant program
CH	26/09/23	315.00	2.50	787.50	Research equitable subrogation
CH	27/09/23	315.00	2.00	630.00	Emails with R. English re subrogation; Further research re equitable subrogation of the debtor's estate to itself or other avenues for recovery against directors personally
TOTAL:			90.60	\$62,084.50	

Name	Year of Call	Title	Hours	Rate	Value
English, D. Robb (DRE)	1980	Partner	41.30	\$950.00	\$39,235.00
Horsten, Calvin (CH)		Student	4.50	\$315.00	\$1,417.50
Lici, Matilda (ML)	2020	Associate	12.80	\$395.00	\$5,056.00
Pedro, Mario (MP)	2016	Partner	31.60	\$515.00	\$16,274.00
Williams, Patrick L. (PLW)		Law Clerk	0.40	\$255.00	\$102.00
OUR FEE					\$62,084.50
HST @ 13%					8,070.99
AMOUNT DUE					\$70,155.49 CAD

THIS IS OUR INVOICE HEREIN
 AIRD & BERLIS LLP



D. Robb English
 E.&O.E.

Payment Information

Payment by Wire Transfer:		Payment by Cheque:
Beneficiary Bank:	Beneficiary:	Payable To:
[Redacted]	Aird & Berlis LLP	Aird & Berlis LLP
[Redacted]	Bank No.:	Brookfield Place, Suite 1800
[Redacted]	Transit No.:	181 Bay Street
[Redacted]	Account:	Toronto, ON M5J 2T9
[Redacted]	Swift Code:	

Email notification for EFT and WIRE payments: accounting@airdberlis.com

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GST / HST Registration # [Redacted]

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Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

September 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1355130

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

REMITTANCE SLIP

Total Fees	\$62,084.50
Total Taxes	8,070.99
AMOUNT DUE	<u>\$70,155.49 CAD</u>

Payment Information

Payment by Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

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GST / HST Registration # [REDACTED]

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Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

November 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1364979

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending November 30, 2023

Total Fees	\$1,235.00
Total Taxes	160.55
Amount Due	\$1,395.55 CAD

Payment by EFT / Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
	Bank No.:	
	Transit No.:	
	Account:	
	Swift Code:	

Payment by Cheque:

Payable To:
 Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
 Toronto, ON M5J 2T9

Bill.Com Payment Network ID: c114483219512158

Email notification for EFT and WIRE payments: accounting@airdberlis.com

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Payment is due on receipt.

Please quote our Matter No. and the invoice number(s) to ensure correct allocation of payment.

IN ACCORDANCE WITH THE SOLICITORS ACT, ONTARIO, INTEREST WILL BE CHARGED AT THE RATE OF 5% PER ANNUM ON UNPAID AMOUNTS CALCULATED FROM A DATE THAT IS ONE MONTH AFTER THIS INVOICE IS DELIVERED.

GST / HST Registration #

* For legal services provided to clients residing in British Columbia, Quebec, Manitoba and Saskatchewan, clients are advised to self-assess provincial sales tax on fees and disbursements charged.



Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
 Toronto, Ontario M5J 2T9 Canada

T 416 863 1500
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 airdberlis.com

Deloitte Restructuring Inc.
 8 Adelaide St W #200
 Toronto, Ontario
 M5H 0A9 Canada

November 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1364979

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

FOR PROFESSIONAL SERVICES RENDERED on your behalf throughout the period ending November 30, 2023

MEMBER	DATE	RATE	HOURS	VALUE	DESCRIPTION
DRE	13/10/23	950.00	0.20	190.00	Telephone call with J. Sleeth
DRE	19/10/23	950.00	0.20	190.00	Update on recoveries
DRE	23/10/23	950.00	0.20	190.00	Update on timing of distribution
DRE	07/11/23	950.00	0.30	285.00	Update on timing of report and motion
DRE	21/11/23	950.00	0.40	380.00	Exchanges with J. Sleeth and update timing of distribution
TOTAL:			1.30	\$1,235.00	

Name	Year of Call	Title	Hours	Rate	Value
English, D. Robb (DRE)	1980	Partner	1.30	\$950.00	\$1,235.00

OUR FEE \$1,235.00
 HST @ 13% 160.55

AMOUNT DUE \$1,395.55 CAD

THIS IS OUR INVOICE HEREIN
 AIRD & BERLIS LLP

D. Robb English

E.&O.E.

Payment by EFT / Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
[REDACTED]	Bank No.:	[REDACTED]
[REDACTED]	Transit No.:	[REDACTED]
[REDACTED]	Account:	[REDACTED]
[REDACTED]	Swift Code:	[REDACTED]

Payment by Cheque:

Payable To:
Aird & Berlis LLP
Brookfield Place, Suite 1800
181 Bay Street
Toronto, ON M5J 2T9

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GST / HST Registration # [REDACTED]

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November 30, 2023

Attention: Mr. Jordan Sleeth

Invoice No: 1364979

Re: Receiver of Injection Technologies Inc.

Client No: 013945
 Matter No: 309188

REMITTANCE SLIP

Total Fees	\$1,235.00
Total Taxes	160.55
AMOUNT DUE	<u>\$1,395.55 CAD</u>

Payment by EFT / Wire Transfer:

Beneficiary Bank:	Beneficiary:	Aird & Berlis LLP
	Bank No.:	
	Transit No.:	
	Account:	
	Swift Code:	

Payment by Cheque:

Payable To:
 Aird & Berlis LLP
 Brookfield Place, Suite 1800
 181 Bay Street
 Toronto, ON M5J 2T9

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Hours/Value Report by Client

Between May 29, 2023 and Dec 20, 2023
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 Report Values: Fees, Disbursements

Member	Date	T/D	Qty	Rate	Value	Invoice # Description	Task Code
(2340) Lici, Matilda	5-29-2023	T	1.70	295.00	501.50	1342182 (P270); [A103] Draft/Revise - Review lease documents and prepare draft letters to landlords re leases and email to K. Plunkett re same; Email to Deloitte re proposed letters to landlords; Revise and finalize landlord notice letters and email to Deloitte re same	[P270] Regulatory Reviews
(2042) Yantzi, Jonathan	5-30-2023	T	0.30	295.00	88.50	1342182 (P500); [A108] Communicate (other external) - Receive instructions from R. English	[P500] Negotiation/Revision/Responses
(2340) Lici, Matilda	5-30-2023	T	1.40	295.00	413.00	1342182 (P270); [A103] Draft/Revise - Revise service email and instructions re service of lease letters; Status call with Deloitte, TD, T. Hogan et al; Draft letter to Clek and email to R. English re same	[P270] Regulatory Reviews
(1424) van Zandvoort, Mark J.	5-31-2023	T	0.10	425.00	42.50	1342182 (L210); [A104] Review/Analyze - Email from Counsel to BMO and review Notice of Appearance received	[L210] Pleadings
(2340) Lici, Matilda	5-31-2023	T	2.50	295.00	737.50	1342182 (P270); [A103] Draft/Revise - Update service list and email to Deloitte re same; Revise Clek letter and email to S. Damiani re same; Review Services and Supply Agreement and reporting email to client re same; Review draft agreement with Clek; Prepare draft letter to Windsor landlord re occupation of Windsor leased warehouse	[P270] Regulatory Reviews
(2042) Yantzi, Jonathan	6-6-2023	T	0.60	295.00	177.00	1342182 (P500); [A108] Communicate (other external) - Telephone call with the Receiver; review and consider terms of sales agreements	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	6-7-2023	T	2.40	295.00	708.00	1342182 (P500); [A104] Review/Analyze - Review existing purchase orders, invoices, and form of settlement agreement; draft sales terms and conditions; confer with R. English and M. Lici; email to the receiver	[P500] Negotiation/Revision/Responses

Hours/Value Report by Client

Between May 29, 2023 and Dec 20, 2023

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Report Values: Fees, Disbursements

(2042) Yantzi, Jonathan	6-12-2023	T	1.90	295.00	560.50	1342182 (P500); [A104] Review/Analyze - Review and revise draft form of settlement and release agreement; email to the receiver	[P500] Negotiation/Revision/Responses
(1760) Plunkett, Kyle B.	6-12-2023	T	0.70	425.00	297.50	1342182 (P300); [A103] Draft/Revise - Review and provide comments on draft settlement agreement re Clek.	[P300] Stucture/Strategy/Analysis
(2042) Yantzi, Jonathan	6-13-2023	T	2.00	295.00	590.00	1342182 (P500); [A106] Communicate (with client) - Telephone call with the client; confer with K. Plunkett; revise settlement agreement; review employee termination letter; review correspondence	[P500] Negotiation/Revision/Responses
(1760) Plunkett, Kyle B.	6-13-2023	T	1.40	425.00	595.00	1342182 (P300); [A106] Communicate (with client) - Prepare and attend call with client to discuss Clek settlement and lease matters; email exchanges with client team regarding same; review and consider termination letter.	[P300] Stucture/Strategy/Analysis
(2042) Yantzi, Jonathan	6-14-2023	T	0.70	295.00	206.50	1342182 (P500); [A108] Communicate (other external) - Confer with the Receiver, K. Plunkett, and M. Lici; review and consider revisions to draft settlement agreement with customer	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	6-15-2023	T	0.30	295.00	88.50	1342182 (P500); [A108] Communicate (other external) - Confer with R. English and M. Lici; review correspondence	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	6-16-2023	T	0.50	295.00	147.50	1345741 (P500); [A108] Communicate (other external) - Telephone call with the receiver; confer with K. Plunkett; review updates to settlement agreement with supplier and consider issues related to sublease	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	6-19-2023	T	1.60	295.00	472.00	1345741 (P500); [A103] Draft/Revise - Revise form of asset purchase agreement; confer with R. English and M. Lici; email to the receiver	[P500] Negotiation/Revision/Responses

Hours/Value Report by Client

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Report Values: Fees, Disbursements

(2042) Yantzi, Jonathan	7-12-2023	T	0.90	295.00	265.50	1345741 (P500); [A104] Review/Analyze - Review bid summaries; telephone call with the receiver	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-14-2023	T	1.20	295.00	354.00	1345741 (P500); [A104] Review/Analyze - Review revisions to settlement and release agreement by customer; confer with cross-border tax specialist; email to the receiver	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-15-2023	T	0.60	295.00	177.00	1345741 (P500); [A104] Review/Analyze - Review and consider issue related to potential customs liability for export of equipment and inventory to U.S.-based customer; email to the receiver	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-17-2023	T	1.80	295.00	531.00	1349940 (P500); [A104] Review/Analyze - Review customer settlement and release agreement; telephone call to the receiver; review asset purchase bids; confer with R. English and M. Cappabianca	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-19-2023	T	1.60	295.00	472.00	1349940 (P500); [A104] Review/Analyze - Review revised bids; revise asset purchase agreement re landlord cure costs; telephone call with the receiver re revised bids	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-20-2023	T	2.00	295.00	590.00	1349940 (P500); [A104] Review/Analyze - Review revised asset purchase agreement and consider bid; confer with R. English	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-21-2023	T	1.20	295.00	354.00	1349940 (P500); [A103] Draft/Revise - Revise asset purchase agreement; confer with R. English; email to the receiver	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	7-21-2023	T	0.60	295.00	177.00	1349940 (P500); [A105] Communicate (in firm) - Internal meeting re revisions to APA	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	7-22-2023	T	1.10	295.00	324.50	1349940 (P500); [A103] Draft/Revise - Revise APA; Internal discussion re revisions to APA; Correspondence with buyer counsel re APA	[P500] Negotiation/Revision/Responses

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Hours/Value Report by Client

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Report Values: Fees, Disbursements

(2328) Cappabianca, Michael Anthony	7-24-2023	T	0.40	295.00	118.00	1349940 (P500); [A106] Communicate (with client) - Various correspondence with receiver re revisions to APA; Various correspondence with purchaser counsel re revisions to APA	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	7-25-2023	T	2.40	295.00	708.00	1349940 (P500); [A103] Draft/Revise - Further revisions to APA; All-hands call with receiver and TD re updates to APA and ASA; Internal discussion re employment matters; Various internal correspondence and correspondence with receiver	[P500] Negotiation/Revision/Responses
(1494) Lisi, Lorenzo	7-25-2023	T	0.30	675.00	202.50	1349940 (L120); [A105] Communicate (in firm) - Email exchange with M. Cappabianca regarding sale of business and employment issues	[L120] Analysis/Strategy
(2328) Cappabianca, Michael Anthony	7-26-2023	T	3.10	295.00	914.50	1349940 (P500); [A103] Draft/Revise - Further revisions to APA; Various correspondence and discussion with receiver re APA; Various internal correspondence re APA	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	7-27-2023	T	0.80	295.00	236.00	1349940 (P500); [A103] Draft/Revise - Revise APA; Various internal correspondence; Correspondence with Receiver	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	7-31-2023	T	0.80	295.00	236.00	1349940 (P500); [A104] Review/Analyze - Review revisions asset purchase agreement; confer with M. Cappabianca and M. Lici	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	7-31-2023	T	1.00	295.00	295.00	1349940 (P400); [A107] Communicate (with outside counsel) - Correspondence with buyer counsel re APA and BMO machine; Various internal discussion and correspondence re APA	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-1-2023	T	1.80	295.00	531.00	1349940 (P500); [A104] Review/Analyze - Review draft auction services agreement; confer with M. Lici; email to the receiver	[P500] Negotiation/Revision/Responses

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Report Values: Fees, Disbursements

(2328) Cappabianca, Michael Anthony	8-1-2023	T	0.30	295.00	88.50	1349940 (P280); [A105] Communicate (in firm) - Internal discussion re lease agreements and consent to transfer agreements	[P280] Other
(2042) Yantzi, Jonathan	8-3-2023	T	1.60	295.00	472.00	1349940 (P500); [A104] Review/Analyze - Review the receiver's revisions to the draft auction services agreement; telephone call with the receiver	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-3-2023	T	0.50	295.00	147.50	1349940 (P400); [A103] Draft/Revise - Begin draft of closing agenda for APA	[P400] Initial Document Preparation/Filing
(2328) Cappabianca, Michael Anthony	8-4-2023	T	0.70	295.00	206.50	1349940 (P400); [A103] Draft/Revise - Complete draft of APA closing agenda	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-8-2023	T	0.40	295.00	118.00	1349940 (P500); [A104] Review/Analyze - Review draft closing agenda and confer with M. Cappabianca	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-8-2023	T	1.10	295.00	324.50	1349940 (P400); [A103] Draft/Revise - Revise closing agenda; Draft bill of sale and general conveyance; Internal correspondence; Correspondence with receiver	[P400] Initial Document Preparation/Filing
(2328) Cappabianca, Michael Anthony	8-10-2023	T	0.50	295.00	147.50	1349940 (P400); [A107] Communicate (with outside counsel) - Correspondence with purchaser's counsel; Various internal correspondence re BMO, APA and landlord consents	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-14-2023	T	0.60	295.00	177.00	1349940 (P500); [A104] Review/Analyze - Review draft receiver's report; redact appendices; confer with R. English and M. Cappabianca	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-14-2023	T	0.60	295.00	177.00	1349940 (P400); [A103] Draft/Revise - Revise bill of sale; Internal discussion re receiver's report; Various correspondence with purchaser's counsel	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-15-2023	T	0.30	295.00	88.50	1349940 (P500); [A104] Review/Analyze - Review schedules to receiver's report; email to T. Hogan	[P500] Negotiation/Revision/Responses

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(2328) Cappabianca, Michael Anthony	8-15-2023	T	0.70	295.00	206.50	1349940 (P500); [A106] Communicate (with client) - Various correspondence with receiver re schedules to APA re purchased assets; Various internal correspondence	[P500] Negotiation/Revision/Responses
(1484) Spence, Miranda E.	8-15-2023	T	0.20	495.00	99.00	1353372 (L120); [A104] Review/Analyze - Review emails from R. English, T. Hogan re August 25 motion	[L120] Analysis/Strategy
(2328) Cappabianca, Michael Anthony	8-16-2023	T	0.30	295.00	88.50	1349940 (P500); [A107] Communicate (with outside counsel) - Internal discussion and correspondence re A/R purchase agreement; Correspondence with purchaser counsel	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	8-17-2023	T	0.80	325.00	260.00	1353372 (P500); [A104] Review/Analyze - Review and consider issues related to third-party equipment and materials; telephone call with the receiver	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-17-2023	T	1.30	295.00	383.50	1349940 (P280); [A106] Communicate (with client) - All-hands call with Receiver re accounts receivable purchase agreement, landlord consents and customer owned resins and tools; Various internal correspondence; Correspondence with receiver	[P280] Other
(2328) Cappabianca, Michael Anthony	8-21-2023	T	3.90	295.00	1,150.50	1353372 (P400); [A103] Draft/Revise - Prepare & draft A/R purchase agreement; Draft direction to pay re: A/R; Correspondence with purchaser's counsel	[P400] Initial Document Preparation/Filing
(2328) Cappabianca, Michael Anthony	8-22-2023	T	1.30	295.00	383.50	1353372 (P400); [A103] Draft/Revise - Continue A/R purchase agreement; Correspondence with purchaser's counsel & receiver re: APA closing & additional documents	[P400] Initial Document Preparation/Filing
(2328) Cappabianca, Michael Anthony	8-24-2023	T	1.40	295.00	413.00	1353372 (P500); [A106] Communicate (with client) - Correspondence with receiver re: employment agreements; correspondence with purchaser's counsel; internal correspondence	[P500] Negotiation/Revision/Responses

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(2328) Cappabianca, Michael Anthony	8-25-2023	T	2.70	295.00	796.50	1353372 (P500); [A103] Draft/Revise - Review approval & vesting order; Complete first draft of A/R Purchase Agreement & Letter of Direction	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-28-2023	T	1.10	295.00	324.50	1353372 (P400); [A105] Communicate (in firm) - Preparation of letters to customers re: third-party tools, resins, molds, etc., internal correspondence	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-29-2023	T	0.30	325.00	97.50	1353372 (P500); [A104] Review/Analyze - Review letters to employees	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-29-2023	T	0.80	295.00	236.00	1353372 (P400); [A103] Draft/Revise - Draft funding direction; Internal correspondence; Correspondence with purchaser's counsel; Correspondence with receiver	[P400] Initial Document Preparation/Filing
(2042) Yantzi, Jonathan	8-30-2023	T	0.70	325.00	227.50	1353372 (P500); [A104] Review/Analyze - Review asset sale closing agenda; confer with R. English, M. Cappabianca, and M. Pedro	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-30-2023	T	1.20	295.00	354.00	1353372 (P100); [A105] Communicate (in firm) - Internal call re status of APA closing and review of agenda; various internal correspondence	[P100] Project Administration
(1838) McLean, Jenaya E.	8-30-2023	T	0.10	275.00	27.50	1353372 (P500); [A104] Review/Analyze - Order, review and report on profile	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	8-31-2023	T	2.60	295.00	767.00	1353372 (P500); [A103] Draft/Revise - All-hands pre-closing status call; Revise agenda; Draft statement of adjustments; Revise funding direction; Various correspondence with Receiver & Purchaser counsel	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-1-2023	T	1.20	295.00	354.00	1353372 (P500); [A103] Draft/Revise - Review and revise OC & resolution re: asset purchase agreement; various correspondence with purchaser's counsel	[P500] Negotiation/Revision/Responses

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(2042) Yantzi, Jonathan	9-5-2023	T	1.40	325.00	455.00	1353372 (P500); [A104] Review/Analyze - Review and consider issues related to tax election and indemnity; confer with R. English and M. Cappabianca; confer with A. Gentile; plan and prepare for closing	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-5-2023	T	3.70	295.00	1,091.50	1353372 (P500); [A103] Draft/Revise - All-hands call re: Windsor/Kitchener assets; Internal correspondence re APA & AR agreement; Revise statement of adjustments & funding direction; Correspondence with purchaser counsel; Prepare purchaser tax indemnity	[P500] Negotiation/Revision/Responses
(1795) Gentile, Angelo	9-5-2023	T	1.30	850.00	1,105.00	1353372 (P220); [A104] Review/Analyze - Reviewing emails in respect of proposed asset transfer; Reviewing relevant agreements; Providing preliminary HST advice; Reviewing proposed HST indemnity; Reviewing HST indemnity and emails regarding same	[P220] Tax
(2328) Cappabianca, Michael Anthony	9-6-2023	T	3.80	295.00	1,121.00	1353372 (P500); [A103] Draft/Revise - Revise A/R purchase agreement; Various correspondence with receiver & purchaser counsel to facilitate APA closing	[P500] Negotiation/Revision/Responses
(1795) Gentile, Angelo	9-6-2023	T	0.50	850.00	425.00	1353372 (P220); [A104] Review/Analyze - Reviewing various emails in respect of the transaction; Reviewing revised indemnity and HST provisions in respect of the transaction; Emails regarding same and regarding next steps	[P220] Tax
(2042) Yantzi, Jonathan	9-7-2023	T	0.70	325.00	227.50	1353372 (P500); [A104] Review/Analyze - Review and revise draft accounts receivable purchase agreement	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-7-2023	T	1.30	295.00	383.50	1353372 (P500); [A103] Draft/Revise - Further revisions to AR purchase agreement; Internal correspondence	[P500] Negotiation/Revision/Responses

CDBURNS

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Report Values: Fees, Disbursements

(2042) Yantzi, Jonathan	9-8-2023	T	0.80	325.00	260.00	1353372 (P500); [A103] Draft/Revise - Review and revise draft accounts receivable purchase agreement	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-8-2023	T	0.20	295.00	59.00	1353372 (P500); [A107] Communicate (with outside counsel) - Internal correspondence; Correspondence with receiver re AP and inventory Purchase Agreement	[P500] Negotiation/Revision/Responses
(2042) Yantzi, Jonathan	9-14-2023	T	0.20	325.00	65.00	1353372 (P500); [A104] Review/Analyze - Review status of receivables and inventory sale transaction; email to the receiver; email to the purchaser's counsel	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-20-2023	T	0.60	295.00	177.00	1357175 (P500); [A107] Communicate (with outside counsel) - Various correspondence with purchaser counsel re RIPA and ancillary documents required for closing; Correspondence with receiver	[P500] Negotiation/Revision/Responses
(2328) Cappabianca, Michael Anthony	9-21-2023	T	1.30	295.00	383.50	1357175 (P400); [A103] Draft/Revise - Revise RIPA and bills of sale; Various correspondence with purchaser counsel; Various correspondence with receiver; Various internal correspondence	[P400] Initial Document Preparation/Filing
(2328) Cappabianca, Michael Anthony	9-22-2023	T	1.40	295.00	413.00	1357175 (P600); [A107] Communicate (with outside counsel) - Various correspondence with purchaser counsel and receiver re RIPA closing; Compile closing documents	[P600] Completion/Closing
(2340) Lici, Matilda	5-30-2023	D	44.46	1.00	44.46	1342182 (EXP); 415 Dobbie Drive	[EXP] Expense
(2340) Lici, Matilda	5-30-2023	D	21.33	1.00	21.33	1342182 (EXP); Unit 19 - 418 Hanlan Rd.	[EXP] Expense
(2340) Lici, Matilda	5-31-2023	D	19.08	1.00	19.08	1342182 (EXP); 53 ranee ave	[EXP] Expense
(2340) Lici, Matilda	5-31-2023	D	21.33	1.00	21.33	1342182 (EXP); 19-418 HANLAN RD	[EXP] Expense
(2328) Cappabianca, Michael Anthony	8-30-2023	D	10.00	1.00	10.00	1353372 (EXP); eCore11775 - AARKEL TESTING TECHNOLOGIES INC. \ Entity Profile Report	[EXP] Expense

Hours/Value Report by Client

Between May 29, 2023 and Dec 20, 2023

Time type: Billable, NonBillable, Accountable

Status: Billed, Unbilled, Not Posted, Prebill, Written-Off, Cosmetic

Report Values: Fees, Disbursements

(2328) Cappabianca, Michael Anthony	8-30-2023	D	8.00	1.00	8.00	1353372 (EXP); eCore11775 - AARKEL TESTING TECHNOLOGIES INC. \ Entity Profile Report	[EXP] Expense
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Hours/Value Report by Client

Between May 29, 2023 and Dec 20, 2023
 Time type: Billable, NonBillable, Accountable
 Status: Billed, Unbilled, Not Posted, Prebill, Written-Off, Cosmetic
 Report Values: Fees, Disbursements

Working Member Summary

Name	Rate	Chargeable		Non-Chargeable	
		Hours	Value	Hours	Value
(1424) van Zandvoort, Mark J.	425.00	0.10	42.50	0.00	0.00
(1484) Spence, Miranda E.	495.00	0.20	99.00	0.00	0.00
(1494) Lisi, Lorenzo	675.00	0.30	202.50	0.00	0.00
(1760) Plunkett, Kyle B.	425.00	2.10	892.50	0.00	0.00
(1795) Gentile, Angelo	850.00	1.80	1,530.00	0.00	0.00
(1838) McLean, Jenaya E.	275.00	0.10	27.50	0.00	0.00
(2042) Yantzi, Jonathan	302.24	30.00	8,997.00	0.00	0.00
(2328) Cappabianca, Michael Anthony	295.00	43.90	12,950.50	0.00	0.00
(2340) Lici, Matilda	295.00	5.60	1,652.00	0.00	0.00

Disbursement Summary

Disbursement Type - Content	Value
(119) Due Diligence-Gov Fee	8.00
(120) Due Diligence	10.00
(DE) Deliveries	106.20

	Time		Disbursements	
	Hours	Value	Values	Total
Non Chargeable	0.00	0.00	0.00	0.00
Chargeable (WIP)	84.10	26,393.50	124.20	76,112.70

Hours/Value Report by Client

Between May 29, 2023 and Dec 20, 2023

Time type: Billable, NonBillable, Accountable

Status: Billed, Unbilled, Not Posted, Prebill, Written-Off, Cosmetic

Report Values: Fees, Disbursements

Total	84.10	26,393.50	124.20	76,112.70
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Attached is Exhibit "B"
Referred to in the
AFFIDAVIT OF MATILDA LICI
Sworn before me
this 20th day of December, 2023

DocuSigned by:

038C3F6DDBF2489...

Adrienne Ho
A commissioner, etc

STATEMENT OF RESPONSIBLE INDIVIDUALS

Aird & Berlis LLP's professional fees herein are made with respect to the following individuals

Lawyer	Call to Bar	Hourly Rate	Total Time	Value
M. Cappabianca	2021	\$295.00	43.9	\$12,950.50
R. English	1980	\$950.00	69.9	\$66,405.00
A. Gentile	2007	\$850.00	1.8	\$1,530.00
M. Lici	2020	\$395.00	52.3	\$20,658.50
		\$295.00	5.6	\$1,652.00
L. Lisi	1990	\$675.00	0.3	\$202.50
J. Longo	1989	\$850.00	2.1	\$1,785.00
M. Muskat	1990	\$750.00	0.5	\$375.00
M. Pedro	2016	\$515.00	41.8	\$21,527.00
K. Plunkett	2011	\$650.00	3.6	\$2,340.00
		\$425.00	2.1	\$892.50
M. Spence	2011	\$495.00	0.2	\$99.00
J. Yantzi	2019	\$425.00	2.0	\$850.00
		\$295.00	30.0	\$8,850.00
M. van Zandvoort	2010	\$425.00	0.1	\$42.50
Clerk/Student	Call to Bar	Hourly Rate	Total Time	Value
A. Bernicchia-Freeman	N/A	\$315.00	2.0	\$630.00
C. Horsten	N/A	\$315.00	4.5	\$1,417.50
S. Lima	N/A	\$215.00	0.2	\$43.00
J. McLean	N/A	\$275.00	0.1	\$27.50
I. Spiliakos	N/A	\$315.00	6.1	\$1,921.50
P. Williams	N/A	\$255.00	0.4	\$102.00

**Standard hourly rates listed. However, in certain circumstances adjustments to the account may have been made.*

THE TORONTO-DOMINION BANK
Applicant

- and -

INJECTION TECHNOLOGIES INC. et al.
Respondents

Court File No. CV-23-00699663-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at Toronto

AFFIDAVIT OF MATILDA LICI
(sworn December 20, 2023)

AIRD & BERLIS LLP

Brookfield Place
181 Bay Street, Suite 1800
Toronto, ON M5J 2T9

Robb English (LSO # 19862F)

Tel: 416-865-4748

Email: renglish@airdberlis.com

Matilda Lici (LSO # 79621D)

Tel: 416-865-3428

Email: mlici@airdberlis.com

*Lawyers for Deloitte Restructuring Inc. in its capacity as
Court-appointed receiver and manager of Injection
Technologies Inc., Moldco Plastics Inc., and Moldco
Holdings Inc.*

APPENDIX "N"

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.

Respondents

**AFFIDAVIT OF THOMAS MASTERSON
(Sworn December 21, 2023)**

I, **THOMAS MASTERSON**, of the City of London, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am a solicitor qualified to practice law in the Province of Ontario and I am a lawyer with Harrison Pensa ^{LLP}, who acts as counsel for Deloitte Restructuring Inc., in its capacity as Court-Appointed Receiver of the Respondents, Injection Technologies Inc., Moldco Plastics Inc. and Moldco Holdings Inc., in the within proceeding, and as such I have knowledge of the matters to which I hereinafter depose except for those matters based expressly upon information and belief.
2. Attached hereto and marked as **Exhibit "A"** is a summary of the time incurred by professionals at Harrison Pensa ^{LLP}, the hourly rate and fees associated with such and disbursements for the period of May 15, 2023 to June 5, 2023.
3. Attached hereto and marked as **Exhibit "B"** are particulars of time spent by professionals at Harrison Pensa ^{LLP} in connection with this matter for the period of May 15, 2023 to June 5, 2023 and an account statement detailing the services provided dated June 6, 2023.

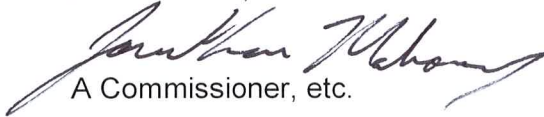
4. Attached hereto and marked as **Exhibit “C”** is a summary of the time incurred by professionals at Harrison Pensa ^{LLP}, the hourly rate and fees associated with such and disbursements for the period of June 5, 2023 to June 13, 2023.
5. Attached hereto and marked as **Exhibit “D”** are particulars of time spent by professionals at Harrison Pensa ^{LLP} in connection with this matter for the period of June 5, 2023 to June 13, 2023 and an account statement detailing the services provided dated June 16, 2023.
6. Attached hereto and marked as **Exhibit “E”** is a summary of the time incurred by professionals at Harrison Pensa ^{LLP}, the hourly rate and fees associated with such and disbursements for the period of June 14, 2023 to June 29, 2023.
7. Attached hereto and marked as **Exhibit “F”** are particulars of time spent by professionals at Harrison Pensa ^{LLP} in connection with this matter for the period of June 14, 2023 to June 29, 2023 and an account statement detailing the services provided dated July 10, 2023.
8. Attached hereto and marked as **Exhibit “G”** is a summary of the time incurred by professionals at Harrison Pensa ^{LLP}, the hourly rate and fees associated with such and disbursements for the period of July 5, 2023 to July 31, 2023.
9. Attached hereto and marked as **Exhibit “H”** are particulars of time spent by professionals at Harrison Pensa ^{LLP} in connection with this matter for the period of July 5, 2023 to July 31, 2023 and an account statement detailing the services provided dated August 1, 2023.
10. Attached hereto and marked as **Exhibit “I”** is a summary of the time incurred by professionals at Harrison Pensa ^{LLP}, the hourly rate and fees associated with such and disbursements for the period of July 27, 2023 to August 16, 2023.
11. Attached hereto and marked as **Exhibit “J”** are particulars of time spent by professionals at Harrison Pensa ^{LLP} in connection with this matter for the period of July 27, 2023 to August 16, 2023 and an account statement detailing the services provided dated August 17, 2023.

12. Attached hereto and marked as **Exhibit “K”** is a summary of the time incurred by professionals at Harrison Pensa^{LLP}, the hourly rate and fees associated with such and disbursements for the period of August 17, 2023 to August 31, 2023.
13. Attached hereto and marked as **Exhibit “L”** are particulars of time spent by professionals at Harrison Pensa^{LLP} in connection with this matter for the period of August 17, 2023 to August 31, 2023 and an account statement detailing the services provided dated September 1, 2023.
14. Attached hereto and marked as **Exhibit “M”** is a summary of the time incurred by professionals at Harrison Pensa^{LLP}, the hourly rate and fees associated with such and disbursements for the period of August 31, 2023 to September 23, 2023.
15. Attached hereto and marked as **Exhibit “N”** are particulars of time spent by professionals at Harrison Pensa^{LLP} in connection with this matter for the period of August 31, 2023 to September 23, 2023 and an account statement detailing the services provided dated October 3, 2023.
16. Attached hereto and marked as **Exhibit “O”** is a summary of the time incurred by professionals at Harrison Pensa^{LLP}, the hourly rate and fees associated with such and disbursements for the period of September 25, 2023 to October 31, 2023.
17. Attached hereto and marked as **Exhibit “P”** are particulars of time spent by professionals at Harrison Pensa^{LLP} in connection with this matter for the period of September 25, 2023 to October 31, 2023 and an account statement detailing the services provided dated November 1, 2023.
18. Attached hereto and marked as **Exhibit “Q”** is a summary of the time incurred by professionals at Harrison Pensa^{LLP}, the hourly rate and fees associated with such and disbursements for the period of October 31, 2023 to November 30, 2023.
19. Attached hereto and marked as **Exhibit “R”** are particulars of time spent by professionals at Harrison Pensa^{LLP} in connection with this matter for the period of October 31, 2023 to November 30, 2023 and an account statement detailing the services provided dated December 1, 2023.

20. The hourly billing rates set out in the Exhibits are comparable to the hourly rates charged by Harrison Pensa ^{LLP} for services rendered in relation to similar proceedings.
21. The fees and disbursements of Harrison Pensa ^{LLP} in this matter to December 1, 2023 are as follows:
1. Total Billed Fees and Disbursements from May 15, 2023 to June 5, 2023 - \$10,838.96;
 2. Total Billed Fees and Disbursements from June 5, 2023 to June 13, 2023 - \$3,794.09;
 3. Total Billed Fees and Disbursements from June 14, 2023 to June 29, 2023 - \$8,969.78;
 4. Total Billed Fees and Disbursements from July 5, 2023 to July 31, 2023 - \$10,372.29;
 5. Total Billed Fees and Disbursements from July 27, 2023 to August 16, 2023 - \$10,135.85;
 6. Total Billed Fees and Disbursements from August 17, 2023 to August 31, 2023 - \$13,313.48;
 7. Total Billed Fees and Disbursements from August 31, 2023 to September 23, 2023 - \$5,644.90;
 8. Total Billed Fees and Disbursements from September 25, 2023 to October 31, 2023 - \$4,661.97;
 9. Total Billed Fees and Disbursements from October 31, 2023 to November 30, 2023 - \$3,484.92
 - 10. Total - \$71,216.24.**
22. The weighted average hourly rate charged by professionals at Harrison Pensa ^{LLP} is \$380.32.
23. Assuming that this Honourable Court grants the relief sought and that there is no opposition to the Receiver's motion, Harrison Pensa's anticipated legal fees, exclusive of taxes and disbursements, to the discharge of the Receiver are anticipated to total \$30,000.00.

24. I make this Affidavit in support of among other things, approval of fees and disbursements of the counsel for the Receiver.

SWORN BEFORE ME at the City)
of London, in the Province of)
Ontario this 21st day)
of December, 2023.)


A Commissioner, etc.)



THOMAS MASTERSON

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

BETWEEN:

THE TORONTO-DOMINION BANK

Applicant

- and -

INJECTION TECHNOLOGIES INC., MOLDCO PLASTICS INC.,
AND MOLDCO HOLDINGS INC.

Respondents

EXHIBITS

TABS "A" TO "R" ARE THE
EXHIBITS TO THE AFFIDAVIT OF
THOMAS MASTERSON
SWORN THIS 21st DAY OF DECEMBER, 2023

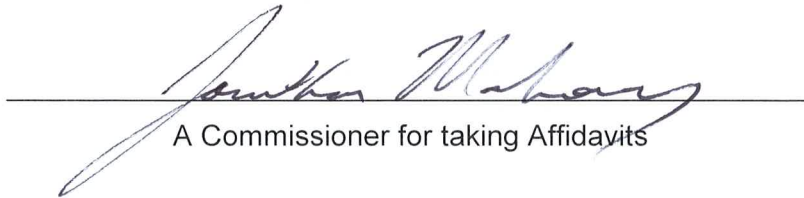

A Commissioner for taking Affidavits

EXHIBIT A

(From May 15, 2023 to June 5, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	12.00	\$550.00	\$6,600.00
	Robert Danter	2016	4.00	\$340.00	\$1,360.00
Associates	Thomas Masterson	2019	1.00	\$250.00	\$250.00
Students	Hugh McHenry		1.50	\$150.00	\$225.00
Clerks	Olivia Rajsp		0.50	\$200.00	\$100.00
	Lindsay Ferguson		0.30	\$180.00	\$54.00
	Isabelle Stacey		1.40	\$145.00	\$203.00
TOTAL FEES					\$8,792.00
HST ON FEES					\$1,142.96
TOTAL TAXABLE DISBURSEMENTS					\$649.70
TOTAL NON – TAXABLE DISBURSEMENTS					\$169.84
HST DISBURSEMENTS					\$84.46
TOTAL FEES, DISBURSEMENTS AND HST					\$10,838.96

EXHIBIT B

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King St. East
Kitchener
ON N2P 2G5

June 6, 2023
Invoice #: 236277
Account #: 236277-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
15-May-23	E-mail with client	.40	\$220.00	TCH
15-May-23	Call with client	.20	\$110.00	TCH
16-May-23	Call with client	.50	\$275.00	TCH
16-May-23	Review/revise proposed sale process	.50	\$275.00	TCH
16-May-23	E-mail to client	.20	\$110.00	TCH
17-May-23	E-mail with client	.20	\$110.00	TCH
17-May-23	Review report, e-mail to client	.50	\$275.00	TCH
17-May-23	Review bank application	.20	\$110.00	TCH
18-May-23	Review report and e-mail to client	.40	\$220.00	TCH
18-May-23	Review report	.20	\$110.00	TCH
18-May-23	E-mails with client	.20	\$110.00	TCH
18-May-23	Call with client	.20	\$110.00	TCH
18-May-23	Compared the pre-filing report for the proposed receiver with schedule A of the claim	1.50	\$225.00	hmc
18-May-23	Memo on sales process, review report, e-mail to client	.40	\$220.00	TCH
18-May-23	Email to counsel	.20	\$68.00	RDA
19-May-23	Call with client	.20	\$110.00	TCH
22-May-23	Review applicant factum	.20	\$110.00	TCH

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
23-May-23	E-mail to service list	.20	\$110.00	TCH
23-May-23	To tab/hyperlink report;	.30	\$43.50	IST
23-May-23	To serve report;	.20	\$29.00	IST
23-May-23	To email correspondence;	.10	\$14.50	IST
24-May-23	To obtain searches;	.40	\$80.00	ORA
24-May-23	To update CaseLines;	.20	\$29.00	IST
24-May-23	E-mail with counsel	.20	\$110.00	TCH
25-May-23	Call with client	.50	\$275.00	TCH
26-May-23	Prepare for and attend Court	.40	\$220.00	TCH
26-May-23	Call with client	.20	\$110.00	TCH
26-May-23	Call with client and Bank counsel	.50	\$275.00	TCH
29-May-23	E-mails with Deloitte	.20	\$110.00	TCH
30-May-23	Call with Deloitte	.60	\$330.00	TCH
30-May-23	Amend e-mail to resin suppliers	.40	\$220.00	TCH
30-May-23	E-mails with Receiver on various issues	.40	\$220.00	TCH
31-May-23	Calls with client	.40	\$220.00	TCH
31-May-23	E-mails with counsel	.40	\$220.00	TCH
31-May-23	To obtain tax certificate;	.30	\$54.00	LFE
31-May-23	Review accommodation agreement and e-mail to client	.40	\$220.00	TCH
31-May-23	Email to client	.20	\$68.00	RDA
31-May-23	Review application record and exhibits	.90	\$306.00	RDA
1-Jun-23	Review documents and draft position re BMO lease	1.00	\$340.00	RDA
1-Jun-23	Finalize/send position re BMO	.30	\$102.00	RDA
1-Jun-23	Call with client	.20	\$110.00	TCH
1-Jun-23	E-mails with client	.20	\$110.00	TCH
2-Jun-23	Review Windsor warehouse letter and e-mail to client	.40	\$220.00	TCH
2-Jun-23	To research	1.00	\$250.00	THM
2-Jun-23	Call with client	.40	\$220.00	TCH
2-Jun-23	To obtain PPSA summary;	.10	\$20.00	ORA
2-Jun-23	To draft PPSA summaries;	.60	\$87.00	IST
2-Jun-23	Meeting with client, TD	.40	\$136.00	RDA
4-Jun-23	TD security opinion	1.00	\$340.00	RDA
5-Jun-23	Call with Kitchener plant warehouse, counsel and client, call with client	1.00	\$550.00	TCH

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
5-Jun-23	Call with BMO counsel	.50	\$275.00	TCH

Total Fees:	\$	8,792.00	
Plus GST:		0.00	
Plus HST:		1,142.96	
Total Fees (INCL TAX)			\$ 9,934.96

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	12.00	\$550.00	\$6,600.00
Thomas Masterson	1.00	\$250.00	\$250.00
Danter Rob	4.00	\$340.00	\$1,360.00
Lindsay Ferguson	.30	\$180.00	\$54.00
Olivia Rajsp	.50	\$200.00	\$100.00
Isabelle Stacey	1.40	\$145.00	\$203.00
Hugh McHenry	1.50	\$150.00	\$225.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees	\$169.84
Total Non-Taxable Disbursements:	<u>169.84</u>


TAXABLE DISBURSEMENTS

Certificate of Status	35.20	
Entity Profile Report	211.20	
Bank Act/Bankruptcy	189.60	
MPAC - Assessment Search	14.00	
PPSA	79.20	
Teranet Search	44.40	
Teranet Writs	16.10	
Title Services	60.00	
Total Taxable Disbursements:	\$	649.70
Plus GST:		0.00
Plus HST:		84.46
Total Disbursements (INCL TAX)		\$ 904.00

TOTAL DUE & OWING	\$ <u>10,838.96</u>
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THIS IS OUR ACCOUNT HEREIN

HARRISON PENZA LLP

Per: 

Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT

Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT C

(From June 5, 2023 to June 13, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	4.20	\$550.00	\$2,310.00
	Robert Danter	2016	2.50	\$340.00	\$850.00
Clerks	Isabelle Stacey		0.80	\$145.00	\$116.00
TOTAL FEES					\$3,276.00
HST ON FEES					\$425.88
TOTAL TAXABLE DISBURSEMENTS					\$81.60
TOTAL NON – TAXABLE DISBURSEMENTS					\$0.00
HST DISBURSEMENTS					\$10.61
TOTAL FEES, DISBURSEMENTS AND HST					\$3,794.09

EXHIBIT D

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King St. East
Kitchener
ON N2P 2G5

June 16, 2023
Invoice #: 236606
Account #: 236606-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
5-Jun-23	Revise opinion re TD	.70	\$238.00	RDA
5-Jun-23	Review Borsche documents	.60	\$204.00	RDA
5-Jun-23	Email to TD counsel re leases	.20	\$68.00	RDA
5-Jun-23	Email to TD counsel	.20	\$68.00	RDA
5-Jun-23	Email to TD/counsel re leases	.20	\$68.00	RDA
6-Jun-23	E-mails with counsel to BMO and client	.40	\$220.00	TCH
6-Jun-23	To summarize PPSA search;	.80	\$116.00	IST
6-Jun-23	Call with client	.30	\$165.00	TCH
6-Jun-23	Call with client and TD Bank	.80	\$440.00	TCH
7-Jun-23	Review Windsor occupation cost letter	.20	\$110.00	TCH
8-Jun-23	Email to TD	.20	\$68.00	RDA
9-Jun-23	Calls and e-mails with client re Sequel Tool	.40	\$220.00	TCH
9-Jun-23	Email to TD re leases	.20	\$68.00	RDA
9-Jun-23	Email to TD re leases	.20	\$68.00	RDA
9-Jun-23	E-mails with counsel	.40	\$220.00	TCH
10-Jun-23	Review/revise e-mail to Sequel	.30	\$165.00	TCH
10-Jun-23	Call/e-mail with client re Sequel	.40	\$220.00	TCH
12-Jun-23	E-mail with client	.20	\$110.00	TCH

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
12-Jun-23	E-mails and calls with client	.40	\$220.00	TCH
13-Jun-23	Review Borsche counsel letter and e-mail to client	.40	\$220.00	TCH
Total Fees:			\$ 3,276.00	
Plus GST:			0.00	
Plus HST:			<u>425.88</u>	
Total Fees (INCL TAX)				\$ <u>3,701.88</u>

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	4.20	\$550.00	\$2,310.00
Danter Rob	2.50	\$340.00	\$850.00
Isabelle Stacey	.80	\$145.00	\$116.00


TAXABLE DISBURSEMENTS

PPSA		81.60	
Total Taxable Disbursements:		\$ 81.60	
Plus GST:		0.00	
Plus HST:		<u>10.61</u>	
Total Disbursements (INCL TAX)			\$ <u>92.21</u>

TOTAL DUE & OWING **\$ 3,794.09**

THIS IS OUR ACCOUNT HEREIN

HARRISON PENZA LLP

Per: 

 Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
 Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT
Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
 HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT E

(From June 14, 2023 to June 29, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	7.80	\$550.00	\$4,290.00
	Robert Danter	2016	10.00	\$340.00	\$3,400.00
Clerks	Olivia Rajsp		0.20	\$200.00	\$40.00
TOTAL FEES					\$7,730.00
HST ON FEES					\$1,004.90
TOTAL TAXABLE DISBURSEMENTS					\$193.70
TOTAL NON – TAXABLE DISBURSEMENTS					\$16.00
HST DISBURSEMENTS					\$25.18
TOTAL FEES, DISBURSEMENTS AND HST					\$8,969.78

EXHIBIT F

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King St. East
Kitchener
ON N2P 2G5

July 10, 2023
Invoice #: 237385
Account #: 237385-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
14-Jun-23	Call/e-mail with Deloitte, call with BMO counsel	.40	\$220.00	TCH
15-Jun-23	Call with client	.40	\$220.00	TCH
15-Jun-23	E-mail with client, e-mail to counsel	.40	\$220.00	TCH
15-Jun-23	E-mail to Sequel counsel	.40	\$220.00	TCH
16-Jun-23	Call with Sequel counsel and e-mail with client	.40	\$220.00	TCH
16-Jun-23	Call with client	.30	\$165.00	TCH
16-Jun-23	E-mails with counsel	.40	\$220.00	TCH
18-Jun-23	E-mails with client	.20	\$110.00	TCH
19-Jun-23	E-mail with Sequel counsel	.20	\$110.00	TCH
19-Jun-23	E-mail with client	.20	\$110.00	TCH
19-Jun-23	Call with client	.20	\$110.00	TCH
20-Jun-23	Call with TD and Deloitte	1.00	\$550.00	TCH
20-Jun-23	E-mail with Sequel counsel, call and e-mail to BMO counsel	.40	\$220.00	TCH
21-Jun-23	Review APS/e-mail to client	.40	\$220.00	TCH
21-Jun-23	E-mails with client	.40	\$220.00	TCH
21-Jun-23	Email to counsel re sideshifter	.30	\$102.00	RDA
21-Jun-23	Email to sequel tool counsel	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
21-Jun-23	Draft mutual release - sequel tool	1.00	\$340.00	RDA
22-Jun-23	Email to client	.20	\$68.00	RDA
22-Jun-23	Revise/finalize release	.30	\$102.00	RDA
22-Jun-23	Email to counsel	.20	\$68.00	RDA
22-Jun-23	Email to client	.20	\$68.00	RDA
22-Jun-23	Email to sequel counsel	.20	\$68.00	RDA
22-Jun-23	Email to sequel counsel	.20	\$68.00	RDA
22-Jun-23	Email to client	.20	\$68.00	RDA
22-Jun-23	Email to client	.20	\$68.00	RDA
22-Jun-23	Email to sequel counsel	.20	\$68.00	RDA
22-Jun-23	Email to sequel counsel	.20	\$68.00	RDA
22-Jun-23	Revise and circulate finalized release	.30	\$102.00	RDA
22-Jun-23	Email to client	.20	\$68.00	RDA
22-Jun-23	E-mails with client	.40	\$220.00	TCH
22-Jun-23	Call/e-mails with client, e-mail to counsel re Sequel	.50	\$275.00	TCH
23-Jun-23	E-mails with counsel and client	.40	\$220.00	TCH
26-Jun-23	To preliminary name search; To obtain PPSA searches;	.20	\$40.00	ORA
26-Jun-23	Email to client	.20	\$68.00	RDA
26-Jun-23	Telephone with client	.40	\$136.00	RDA
26-Jun-23	Email to client	.20	\$68.00	RDA
26-Jun-23	Email to client	.30	\$102.00	RDA
26-Jun-23	Email to client	.20	\$68.00	RDA
26-Jun-23	Draft opinion re BCL	.60	\$204.00	RDA
26-Jun-23	Review draft lease	.20	\$68.00	RDA
26-Jun-23	Revise TD opinion	.50	\$170.00	RDA
28-Jun-23	Draft/revise position re BCL	1.00	\$340.00	RDA
28-Jun-23	Revise opinion re TD	.90	\$306.00	RDA
28-Jun-23	Review BCL issue and e-mail from client on BMO Lease	.40	\$220.00	TCH
29-Jun-23	E-mail from client, e-mail to BMO counsel	.40	\$220.00	TCH
29-Jun-23	Revise TD opinion	1.20	\$408.00	RDA
29-Jun-23	Email to TD re leases	.20	\$68.00	RDA

Total Fees:		\$	7,730.00	
Plus GST:			0.00	
Plus HST:			<u>1,004.90</u>	
Total Fees (INCL TAX)				<u>\$ 8,734.90</u>

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	7.80	\$550.00	\$4,290.00
Danter Rob	10.00	\$340.00	\$3,400.00
Olivia Rajsp	.20	\$200.00	\$40.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees		\$16.00
Total Non-Taxable Disbursements:		<u>16.00</u>


TAXABLE DISBURSEMENTS

PPSA		58.10	
Tax Certificate Search		135.60	
Total Taxable Disbursements:		\$ 193.70	
Plus GST:		0.00	
Plus HST:		<u>25.18</u>	
Total Disbursements (INCL TAX)			<u>\$ 234.88</u>

TOTAL DUE & OWING			<u><u>\$ 8,969.78</u></u>
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THIS IS OUR ACCOUNT HEREIN

HARRISON PENZA LLP

Per: 

Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT

Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT G

(From July 5, 2023 to July 31, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	11.00	\$550.00	\$6,050.00
	Robert Danter	2016	7.90	\$340.00	\$2,686.00
Clerks	Olivia Rajsp		0.30	\$200.00	\$60.00
	Jana Streith		0.20	\$200.00	\$40.00
TOTAL FEES					\$8,836.00
HST ON FEES					\$1,148.68
TOTAL TAXABLE DISBURSEMENTS					\$261.30
TOTAL NON – TAXABLE DISBURSEMENTS					\$92.34
HST DISBURSEMENTS					\$33.97
TOTAL FEES, DISBURSEMENTS AND HST					\$10,372.29

EXHIBIT H

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King St. East
Kitchener
ON N2P 2G5

August 1, 2023
Invoice #: 2222117
Account #: 2222117-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
5-Jul-23	E-mails from client	.40	\$220.00	TCH
6-Jul-23	E-mail to BMO counsel	.20	\$110.00	TCH
6-Jul-23	E-mails with client	.20	\$110.00	TCH
6-Jul-23	E-mail with BMO counsel	.20	\$110.00	TCH
6-Jul-23	Email to TD	.20	\$68.00	RDA
6-Jul-23	Email to TD	.20	\$68.00	RDA
7-Jul-23	Email to client	.20	\$68.00	RDA
10-Jul-23	Email to TD	.20	\$68.00	RDA
10-Jul-23	Revise TD opinion	1.00	\$340.00	RDA
10-Jul-23	Call with Deloitte and Bank	.60	\$330.00	TCH
11-Jul-23	To obtain searches;	.30	\$60.00	ORA
11-Jul-23	E-mail from client	.20	\$110.00	TCH
11-Jul-23	Revise/draft TD opinion	3.00	\$1,020.00	RDA
12-Jul-23	E-mail from client	.20	\$110.00	TCH
12-Jul-23	Various e-mails with counsel and client	.60	\$330.00	TCH
14-Jul-23	Call with Receiver and call with Receiver and Bank/Bank counsel	.80	\$440.00	TCH
14-Jul-23	Draft e-mail to BMO counsel	.40	\$220.00	TCH

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
15-Jul-23	Review/revise TD opinion to receiver	1.00	\$550.00	TCH
18-Jul-23	Revise TD opinion	.30	\$102.00	RDA
18-Jul-23	E-mails with client and counsel re offers	.40	\$220.00	TCH
19-Jul-23	Call with counsel and review Arkell offers, review Aarkell APA and e-mails/call with client	1.00	\$550.00	TCH
19-Jul-23	Draft/revise response to BCL counsel re forklift	1.40	\$476.00	RDA
19-Jul-23	Email to client	.20	\$68.00	RDA
19-Jul-23	Email to client	.20	\$68.00	RDA
19-Jul-23	Call with Deloitte and counsel	.80	\$440.00	TCH
20-Jul-23	Revise response to BCL	.40	\$136.00	RDA
20-Jul-23	Finalize and send BCL response to counsel	.40	\$136.00	RDA
20-Jul-23	Email to client	.20	\$68.00	RDA
21-Jul-23	E-mails with client/counsel	.20	\$110.00	TCH
24-Jul-23	E-mail with client, e-mail with BMO counsel	.20	\$110.00	TCH
25-Jul-23	Call with client and Bank	1.00	\$550.00	TCH
26-Jul-23	E-mails from client	.20	\$110.00	TCH
27-Jul-23	Call with BMO counsel	.20	\$110.00	TCH
27-Jul-23	E-mails/calls with client	.40	\$220.00	TCH
28-Jul-23	E-mails with client and counsel	.60	\$330.00	TCH
28-Jul-23	E-mails with BMO counsel	.80	\$440.00	TCH
28-Jul-23	To obtaining PPSA reports	.20	\$40.00	JST
31-Jul-23	Review/revise security opinion	.40	\$220.00	TCH
Total Fees:			\$ 8,836.00	
Plus GST:			0.00	
Plus HST:			1,148.68	
Total Fees (INCL TAX)				\$ 9,984.68

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	11.00	\$550.00	\$6,050.00
Danter Rob	7.90	\$340.00	\$2,686.00
Olivia Rajsp	.30	\$200.00	\$60.00
Jana Streith	.20	\$200.00	\$40.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees	\$92.34
Total Non-Taxable Disbursements:	92.34


TAXABLE DISBURSEMENTS

Bank Act/Bankruptcy	104.40	
PPSA	156.90	
Total Taxable Disbursements:	\$ 261.30	
Plus GST:	0.00	
Plus HST:	<u>33.97</u>	
Total Disbursements (INCL TAX)		\$ <u>387.61</u>

TOTAL DUE & OWING **\$ 10,372.29**

THIS IS OUR ACCOUNT HEREIN

HARRISON PENSA LLP

Per: 

Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

**TERMS: DUE UPON RECEIPT
Cheque, Mastercard and VISA also accepted.**

Please make cheque payable to:
HARRISON PENSA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT I

(From July 27, 2023 to August 16, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	5.10	\$550.00	\$2,805.00
	Robert Danter	2016	14.20	\$340.00	\$4,828.00
Clerks	Olivia Rajsp		0.20	\$200.00	\$40.00
	Lindsay Ferguson		6.00	\$180.00	\$1,080.00
TOTAL FEES					\$8,753.00
HST ON FEES					\$1,137.89
TOTAL TAXABLE DISBURSEMENTS					\$174.30
TOTAL NON – TAXABLE DISBURSEMENTS					\$48.00
HST DISBURSEMENTS					\$22.66
TOTAL FEES, DISBURSEMENTS AND HST					\$10,135.85

EXHIBIT J

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King Street East
Kitchener
N2P 2G5

August 17, 2023
Invoice #: 2222538
Account #: 2222538-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
27-Jul-23	Email to client	.20	\$68.00	RDA
28-Jul-23	Draft/revise position re Moldco van	1.50	\$510.00	RDA
28-Jul-23	Email to client	.20	\$68.00	RDA
2-Aug-23	Email to client	.20	\$68.00	RDA
3-Aug-23	To obtain PPSA searches;	.10	\$20.00	ORA
3-Aug-23	E-mails with client on security review/report	.40	\$220.00	TCH
3-Aug-23	Draft email re cluthe security	.60	\$204.00	RDA
4-Aug-23	E-mail with client	.20	\$110.00	TCH
4-Aug-23	To obtain profile report;	.10	\$20.00	ORA
4-Aug-23	Email to client re cluthe	.40	\$136.00	RDA
9-Aug-23	E-mail with Bank counsel	.20	\$110.00	TCH
10-Aug-23	Email to TD counsel	.20	\$68.00	RDA
11-Aug-23	Review Cluthe issue and e-mail with counsel	.40	\$220.00	TCH
11-Aug-23	E-mails with counsel and client	.40	\$220.00	TCH
14-Aug-23	Call with client	.20	\$110.00	TCH
14-Aug-23	Draft Cluthe email	.60	\$204.00	RDA
14-Aug-23	Revise TD opinion	.30	\$102.00	RDA
14-Aug-23	Email to client	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
14-Aug-23	Email to client	.20	\$68.00	RDA
14-Aug-23	Review dockrill letter	.20	\$68.00	RDA
14-Aug-23	Email to client	.20	\$68.00	RDA
14-Aug-23	Email to client	.20	\$68.00	RDA
15-Aug-23	Final review of record, report, Orders and service list	.40	\$220.00	TCH
15-Aug-23	To prepare Motion Record; To edit Service List; To edit Notice of Motion; To e-mail correspondence with service list;	4.00	\$720.00	LFE
15-Aug-23	Revise email to cluthe counsel	.30	\$102.00	RDA
15-Aug-23	Email to cluthe counsel	.20	\$68.00	RDA
15-Aug-23	Email to TD counsel	.20	\$68.00	RDA
15-Aug-23	Draft/revise notice of motion	1.80	\$612.00	RDA
15-Aug-23	Revise notice of motion	.30	\$102.00	RDA
15-Aug-23	Email to client	.20	\$68.00	RDA
15-Aug-23	Email to TD counsel	.20	\$68.00	RDA
15-Aug-23	Email to TD counsel	.20	\$68.00	RDA
15-Aug-23	Draft Auction AVO	.80	\$272.00	RDA
15-Aug-23	Draft AarKel AVO	.70	\$238.00	RDA
15-Aug-23	Draft ancillary order	.60	\$204.00	RDA
15-Aug-23	Email to client	.20	\$68.00	RDA
15-Aug-23	Email to client	.20	\$68.00	RDA
15-Aug-23	Revise AarKel AVO	.20	\$68.00	RDA
15-Aug-23	Email to TD Counsel	.20	\$68.00	RDA
15-Aug-23	Final review of motion record	.30	\$102.00	RDA
15-Aug-23	Email to client	.20	\$68.00	RDA
15-Aug-23	Telephone with client	.20	\$68.00	RDA
15-Aug-23	Review/revise Report, service list, e-mails with counsel, call with client	2.00	\$1,100.00	TCH
15-Aug-23	Various e-mails with counsel and client re report and AVO (x2) and record	.90	\$495.00	TCH
16-Aug-23	To e-mail correspondence with counsel; To edit service list; To draft cover letter; To hyperlink and bookmark motion record; To draft Affidavit of Service; To file motion record and affidavit of service with Court; To e-mail correspondence from Court;	2.00	\$360.00	LFE
16-Aug-23	Telephone with Bossard counsel	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
16-Aug-23	Meeting with client re bossard	.30	\$102.00	RDA
16-Aug-23	Email to bossard counsel	.30	\$102.00	RDA
16-Aug-23	Email to client	.20	\$68.00	RDA
16-Aug-23	Email t client/draft response to bossard	.40	\$136.00	RDA
16-Aug-23	Email to client	.20	\$68.00	RDA
16-Aug-23	Review client communications with bossard	.20	\$68.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
	Total Fees:		\$ 8,753.00	
	Plus GST:		0.00	
	Plus HST:		<u>1,137.89</u>	
	Total Fees (INCL TAX)			<u>\$ 9,890.89</u>

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	5.10	\$550.00	\$2,805.00
Danter Rob	14.20	\$340.00	\$4,828.00
Lindsay Ferguson	6.00	\$180.00	\$1,080.00
Olivia Rajsp	.20	\$200.00	\$40.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees	\$48.00
Total Non-Taxable Disbursements:	<u>48.00</u>


TAXABLE DISBURSEMENTS

PPSA	174.30
Total Taxable Disbursements:	\$ 174.30
Plus GST:	0.00
Plus HST:	<u>22.66</u>
Total Disbursements (INCL TAX)	<u>\$ 244.96</u>

TOTAL DUE & OWING **\$ 10,135.85**

THIS IS OUR ACCOUNT HEREIN

HARRISON PENZA LLP

Per: 

Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT

Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT K

(From August 17, 2023 to August 31, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	5.60	\$550.00	\$3,080.00
	Robert Danter	2016	22.00	\$340.00	\$7,480.00
Clerks	Olivia Rajsp		0.10	\$200.00	\$20.00
	Lindsay Ferguson		0.30	\$180.00	\$54.00
	Isabelle Stacey		5.40	\$145.00	\$783.00
TOTAL FEES					\$11,417.00
HST ON FEES					\$1,484.21
TOTAL TAXABLE DISBURSEMENTS					\$357.76
TOTAL NON – TAXABLE DISBURSEMENTS					\$8.00
HST DISBURSEMENTS					\$46.51
TOTAL FEES, DISBURSEMENTS AND HST					\$13,313.48

EXHIBIT L

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King Street East
Kitchener
N2P 2G5

September 1, 2023
Invoice #: 2223115
Account #: 2223115-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Revise release	.30	\$102.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Revise response to bossard counsel	.90	\$306.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Revise response to bossard counsel	.30	\$102.00	RDA
17-Aug-23	Revise release	.20	\$68.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Response to bossard counsel	.30	\$102.00	RDA
17-Aug-23	Email to client	.20	\$68.00	RDA
17-Aug-23	Telephone with client	.30	\$102.00	RDA
18-Aug-23	Telephone with bossard counsel	.60	\$204.00	RDA
18-Aug-23	Telephone call with client	.30	\$102.00	RDA
18-Aug-23	Response to bossard counsel.	.80	\$272.00	RDA
18-Aug-23	Email to client	.30	\$102.00	RDA
18-Aug-23	Email to client	.20	\$68.00	RDA
18-Aug-23	Email to bossard counsel	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
18-Aug-23	Email to client	.30	\$102.00	RDA
18-Aug-23	Emails to bossard counsel	.40	\$136.00	RDA
18-Aug-23	E-mail from Taylor Made Holdings Ltd. landlord and e-mail to client	.40	\$220.00	TCH
18-Aug-23	E-mails with counsel and client	.40	\$220.00	TCH
20-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
21-Aug-23	Finalize factum	.40	\$136.00	RDA
21-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
21-Aug-23	Draft factum	2.10	\$714.00	RDA
21-Aug-23	Emails to client	.60	\$204.00	RDA
21-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
21-Aug-23	Email to client	.20	\$68.00	RDA
21-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
21-Aug-23	Revise/finalize payout letter	.40	\$136.00	RDA
21-Aug-23	To review CaseLines;	.30	\$54.00	LFE
21-Aug-23	To serve and file court docs;	.30	\$43.50	IST
21-Aug-23	To serve Factum and BOA;	.20	\$29.00	IST
21-Aug-23	To finalize Factum & BOA;	.90	\$130.50	IST
21-Aug-23	Review/revise factum	.40	\$220.00	TCH
22-Aug-23	E-mails with client	.20	\$110.00	TCH
22-Aug-23	Finalize release/stat dec	.30	\$102.00	RDA
22-Aug-23	Email to bossard counsel.	.20	\$68.00	RDA
22-Aug-23	Emails to client	.40	\$136.00	RDA
22-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
22-Aug-23	Emails to client	.40	\$136.00	RDA
22-Aug-23	To serve court docs;	.20	\$29.00	IST
22-Aug-23	To draft and file AOS;	.20	\$29.00	IST
22-Aug-23	To update CaseLines and hyperlink factum;	.80	\$116.00	IST
22-Aug-23	To send Zoom particulars;	.20	\$29.00	IST
22-Aug-23	To obtain profile report;	.10	\$20.00	ORA
22-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
22-Aug-23	Emails to client	.40	\$136.00	RDA
22-Aug-23	Draft statutory declaration	.30	\$102.00	RDA
22-Aug-23	Email to client	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
22-Aug-23	Review searches	.20	\$68.00	RDA
22-Aug-23	Email to bossard counsel	.30	\$102.00	RDA
22-Aug-23	Email to client	.20	\$68.00	RDA
23-Aug-23	To draft confidential appendices;	.70	\$101.50	IST
23-Aug-23	To email court;	.20	\$29.00	IST
23-Aug-23	Email to bossard counsel	.30	\$102.00	RDA
23-Aug-23	Email to client	.20	\$68.00	RDA
23-Aug-23	Review conf. appendices	.40	\$136.00	RDA
23-Aug-23	Email to client	.20	\$68.00	RDA
23-Aug-23	Finalize conf. appendices	.30	\$102.00	RDA
23-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
23-Aug-23	Email to client	.20	\$68.00	RDA
23-Aug-23	Email to court	.20	\$68.00	RDA
23-Aug-23	Email to bossard counsel	.30	\$102.00	RDA
23-Aug-23	Email to client	.20	\$68.00	RDA
23-Aug-23	Call to quest counsel	.20	\$68.00	RDA
23-Aug-23	E-mails with counsel and client	.40	\$220.00	TCH
24-Aug-23	E-mail with counsel	.40	\$220.00	TCH
24-Aug-23	Finalize orders	.40	\$136.00	RDA
24-Aug-23	Email to client	.20	\$68.00	RDA
24-Aug-23	Revise aaarkel avo	.30	\$102.00	RDA
24-Aug-23	To update CaseLines;	.30	\$43.50	IST
25-Aug-23	To serve and file orders and endorsements;	1.00	\$145.00	IST
25-Aug-23	To update CaseLines;	.40	\$58.00	IST
25-Aug-23	Revise Aarkel AVO	.20	\$68.00	RDA
25-Aug-23	Preparation for motion	1.00	\$340.00	RDA
25-Aug-23	Revise aarkel AVO	.30	\$102.00	RDA
25-Aug-23	Email to counsel re aarkel AVO	.20	\$68.00	RDA
25-Aug-23	Email to client	.20	\$68.00	RDA
25-Aug-23	Prepare for and attend Court, various calls with counsel, review amended Order (AVO - Aarkel)	2.50	\$1,375.00	TCH
25-Aug-23	E-mail to counsel and from court	.40	\$220.00	TCH
25-Aug-23	Email to client	.20	\$68.00	RDA
25-Aug-23	Email to counsel	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
25-Aug-23	Attendance at motion	.80	\$272.00	RDA
25-Aug-23	Email to court	.30	\$102.00	RDA
25-Aug-23	Call with client	.20	\$68.00	RDA
28-Aug-23	Email to counsel	.20	\$68.00	RDA
29-Aug-23	Review executed bossard documents	.20	\$68.00	RDA
31-Aug-23	Call with client	.50	\$275.00	TCH
Total Fees:			\$ 11,417.00	
Plus GST:			0.00	
Plus HST:			<u>1,484.21</u>	
Total Fees (INCL TAX)				<u>\$ 12,901.21</u>

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	5.60	\$550.00	\$3,080.00
Danter Rob	22.00	\$340.00	\$7,480.00
Lindsay Ferguson	.30	\$180.00	\$54.00
Olivia Rajsp	.10	\$200.00	\$20.00
Isabelle Stacey	5.40	\$145.00	\$783.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees	<u>\$8.00</u>
Total Non-Taxable Disbursements:	8.00


TAXABLE DISBURSEMENTS

Entity Profile Report	18.65
Courier	339.11
Total Taxable Disbursements:	\$ 357.76
Plus GST:	0.00
Plus HST:	<u>46.51</u>
Total Disbursements (INCL TAX)	<u>\$ 412.27</u>

TOTAL DUE & OWING **\$ 13,313.48**

THIS IS OUR ACCOUNT HEREIN

HARRISON PENZA LLP

Per: 

Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT

Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT M

(From August 31, 2023 to September 23, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	3.60	\$550.00	\$1,980.00
	Robert Danter	2016	5.80	\$340.00	\$1,972.00
Students	Sean Molnar		4.40	\$150.00	\$660.00
Clerks	Isabelle Stacey		0.20	\$145.00	\$29.00
TOTAL FEES					\$4,641.00
HST ON FEES					\$603.33
TOTAL TAXABLE DISBURSEMENTS					\$354.49
TOTAL NON – TAXABLE DISBURSEMENTS					\$0.00
HST DISBURSEMENTS					\$46.08
TOTAL FEES, DISBURSEMENTS AND HST					\$5,644.90

EXHIBIT N

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King Street East
Kitchener
N2P 2G5

October 3, 2023
Invoice #: 2224093
Account #: 2224093-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
31-Aug-23	Email to bossard counsel	.20	\$68.00	RDA
31-Aug-23	Email to client	.20	\$68.00	RDA
1-Sep-23	Email to client	.20	\$68.00	RDA
1-Sep-23	Email to client	.20	\$68.00	RDA
1-Sep-23	Email to client	.30	\$102.00	RDA
1-Sep-23	Email to bossard counsel	.30	\$102.00	RDA
1-Sep-23	Email to client	.20	\$68.00	RDA
1-Sep-23	Email to bossard counsel	.20	\$68.00	RDA
3-Sep-23	Review Clek lease, Clek settlement agreement, Clek sublease, e-mail to client	.80	\$440.00	TCH
4-Sep-23	E-mail to counsel	.20	\$110.00	TCH
5-Sep-23	Email to client	.20	\$68.00	RDA
5-Sep-23	Email to bossard counsel	.20	\$68.00	RDA
6-Sep-23	E-mails with client and counsel	.40	\$220.00	TCH
7-Sep-23	E-mail with BMO counsel and with client	.20	\$110.00	TCH
7-Sep-23	To email correspondence;	.20	\$29.00	IST
7-Sep-23	Call with client	.20	\$110.00	TCH
8-Sep-23	E-mail to BMO counsel	.20	\$110.00	TCH

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
12-Sep-23	E-mails with client	.20	\$110.00	TCH
15-Sep-23	Call with client	.40	\$220.00	TCH
15-Sep-23	Email to client	.20	\$68.00	RDA
15-Sep-23	Draft letter to MOL	1.00	\$340.00	RDA
15-Sep-23	Email to client	.20	\$68.00	RDA
15-Sep-23	Email to client	.20	\$68.00	RDA
15-Sep-23	Finalize MOL letter and send to MOL counsel	.40	\$136.00	RDA
15-Sep-23	Email to client	.20	\$68.00	RDA
15-Sep-23	Email to client	.20	\$68.00	RDA
18-Sep-23	To prepare for MOL hearing; to attend MOL hearing; To send internal correspondence re result of MOL hearing	2.50	\$375.00	smo
19-Sep-23	E-mails with client	.40	\$220.00	TCH
19-Sep-23	To determine next steps regarding Injection Technologies Ministry of Labor Ministry of Labour matter	1.60	\$240.00	smo
19-Sep-23	Email to client	.30	\$102.00	RDA
20-Sep-23	Email to client	.40	\$136.00	RDA
20-Sep-23	E-mail to client;	.40	\$220.00	TCH
20-Sep-23	To attend POA hearing; To discuss results of the hearing with Rob Danter	.30	\$45.00	smo
22-Sep-23	Email to crown counsel	.30	\$102.00	RDA
22-Sep-23	Email to client	.20	\$68.00	RDA
23-Sep-23	E-mails with client;	.20	\$110.00	TCH
	Total Fees:		\$ 4,641.00	
	Plus GST:		0.00	
	Plus HST:		603.33	
	Total Fees (INCL TAX)			\$ 5,244.33

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	3.60	\$550.00	\$1,980.00
Danter Rob	5.80	\$340.00	\$1,972.00
Isabelle Stacey	.20	\$145.00	\$29.00
Sean Molnar	4.40	\$150.00	\$660.00

TAXABLE DISBURSEMENTS


Courier	149.14
Westlaw	205.35
Total Taxable Disbursements:	\$ 354.49
Plus GST:	0.00

Plus HST: _____ 46.08
Total Disbursements (INCL TAX) \$ 400.57

TOTAL DUE & OWING \$ 5,644.90

THIS IS OUR ACCOUNT HEREIN

HARRISON PENSA LLP

Per: 
_____ Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543
Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

**TERMS: DUE UPON RECEIPT
Cheque, Mastercard and VISA also accepted.**

Please make cheque payable to:
HARRISON PENSA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT O

(From September 25, 2023 to October 31, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	1.80	\$550.00	\$990.00
	Robert Danter	2016	6.40	\$340.00	\$2,176.00
Students	Sean Molnar		3.00	\$150.00	\$450.00
Clerks	Olivia Rajsp		0.30	\$200.00	\$60.00
TOTAL FEES					\$3,676.00
HST ON FEES					\$477.88
TOTAL TAXABLE DISBURSEMENTS					\$93.00
TOTAL NON – TAXABLE DISBURSEMENTS					\$403.00
HST DISBURSEMENTS					\$12.09
TOTAL FEES, DISBURSEMENTS AND HST					\$4,661.97

EXHIBIT P

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King Street East
Kitchener
N2P 2G5

November 1, 2023
Invoice #: 2225271
Account #: 2225271-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
25-Sep-23	To review stay issues;	2.00	\$300.00	smo
28-Sep-23	Email to client	.20	\$68.00	RDA
29-Sep-23	Draft lease assignment	1.20	\$408.00	RDA
4-Oct-23	Email to client	.20	\$68.00	RDA
4-Oct-23	Meeting with client	.60	\$204.00	RDA
4-Oct-23	Revise lease assignment	1.00	\$340.00	RDA
4-Oct-23	Email to client	.20	\$68.00	RDA
4-Oct-23	Email to client	.20	\$68.00	RDA
4-Oct-23	Review lease assignment	.40	\$220.00	TCH
5-Oct-23	Email to client	.20	\$68.00	RDA
5-Oct-23	Revise lease assignment	.30	\$102.00	RDA
5-Oct-23	Email to client	.20	\$68.00	RDA
10-Oct-23	Email to crown counsel	.20	\$68.00	RDA
10-Oct-23	Email to crown counsel	.20	\$68.00	RDA
13-Oct-23	Review/revise trustee report, e-mail to client	.40	\$220.00	TCH
13-Oct-23	To obtain PPSA searches; To obtain certified PPSA searches;	.30	\$60.00	ORA
13-Oct-23	Email to crown counsel	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
13-Oct-23	Email to crown counsel	.20	\$68.00	RDA
13-Oct-23	TD opinion	.30	\$102.00	RDA
16-Oct-23	Revise opinion re TD	1.00	\$340.00	RDA
16-Oct-23	To attend POA hearing	1.00	\$150.00	smo
17-Oct-23	Review amended Clek lease assignment and e-mail to client	.40	\$220.00	TCH
24-Oct-23	E-mail with client	.20	\$110.00	TCH
30-Oct-23	E-mails with client and Bank counsel	.20	\$110.00	TCH
31-Oct-23	E-mail to client	.20	\$110.00	TCH

Total Fees:	\$	3,676.00
Plus GST:		0.00
Plus HST:		477.88
Total Fees (INCL TAX)		<u>4,153.88</u>

\$ 4,153.88

FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	1.80	\$550.00	\$990.00
Danter Rob	6.40	\$340.00	\$2,176.00
Olivia Rajsp	.30	\$200.00	\$60.00
Sean Molnar	3.00	\$150.00	\$450.00

NON-TAXABLE DISBURSEMENTS

Government Filing Fees	\$64.00
File Motion Record	\$339.00
Total Non-Taxable Disbursements:	<u>403.00</u>

TAXABLE DISBURSEMENTS

PPSA	93.00
Total Taxable Disbursements:	\$ 93.00
Plus GST:	0.00
Plus HST:	<u>12.09</u>
Total Disbursements (INCL TAX)	\$ <u>508.09</u>

TOTAL DUE & OWING

\$ 4,661.97

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HARRISON PENZA LLP

Per: _____
Timothy C. Hogan

E. & O.E.

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Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

TERMS: DUE UPON RECEIPT

Cheque, Mastercard and VISA also accepted.

Please make cheque payable to:
HARRISON PENZA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

EXHIBIT Q

(From October 31, 2023 to November 30, 2023)

	NAME	YEAR OF CALL	ACTUAL HOURS	HOURLY RATE	TOTAL
Partners	Timothy C. Hogan	1995	1.70	\$550.00	\$935.00
	Robert Danter	2016	6.10	\$340.00	\$2,074.00
Students	Sean Molnar		0.50	\$150.00	\$75.00
TOTAL FEES					\$3,084.00
HST ON FEES					\$400.92
TOTAL TAXABLE DISBURSEMENTS					\$0.00
TOTAL NON – TAXABLE DISBURSEMENTS					\$0.00
HST DISBURSEMENTS					\$0.00
TOTAL FEES, DISBURSEMENTS AND HST					\$3,484.92

EXHIBIT R

Harrison Pensa

LAWYERS

130 Dufferin Avenue, Suite 1101
P.O. Box 3237
London, ON N6A 4K3

Telephone: (519) 679 9660
Facsimile: (519) 667 3362

Deloitte & Touche Inc.
4210 King Street East
Kitchener
N2P 2G5

December 1, 2023
Invoice #: 2226318
Account #: 2226318-196904

File #: 196904/Timothy C. Hogan
RE: Injection Technologies Inc.

TO ALL PROFESSIONAL SERVICES RENDERED in connection with the above-noted matter, including:

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
31-Oct-23	Response to clek counsel	.30	\$102.00	RDA
31-Oct-23	Email to counsel	.20	\$68.00	RDA
31-Oct-23	Email to client	.20	\$68.00	RDA
7-Nov-23	E-mail with Clek landlord counsel	.20	\$110.00	TCH
9-Nov-23	Review revised assignment, e-mail to receiver, e-mail to LL counsel	.50	\$275.00	TCH
14-Nov-23	Email to crown counsel	.20	\$68.00	RDA
15-Nov-23	Email to crown counsel	.20	\$68.00	RDA
15-Nov-23	E-mail with client	.20	\$110.00	TCH
16-Nov-23	Review disclosure	1.00	\$340.00	RDA
16-Nov-23	Call with crown	.30	\$102.00	RDA
17-Nov-23	Review disclosure	1.50	\$510.00	RDA
20-Nov-23	To adjourn POA hearing to January 17, 2024	.50	\$75.00	sno
21-Nov-23	Revise assignment	1.00	\$340.00	RDA
22-Nov-23	Review assignment, e-mail to client	.20	\$110.00	TCH
24-Nov-23	Email to client	.20	\$68.00	RDA
27-Nov-23	Email to client	.30	\$102.00	RDA
27-Nov-23	Email to client	.20	\$68.00	RDA

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
28-Nov-23	Email to clek	.30	\$102.00	RDA
28-Nov-23	Email to client	.20	\$68.00	RDA
29-Nov-23	E-mail with BMO counsel, e-mail to client	.40	\$220.00	TCH
30-Nov-23	E-mail to counsel for BMO;	.20	\$110.00	TCH
Total Fees:			\$ 3,084.00	
Plus GST:			0.00	
Plus HST:			<u>400.92</u>	
Total Fees (INCL TAX)				<u>\$ 3,484.92</u>


FEE SUMMARY:

LAWYER	HOURS	RATE	AMOUNT
Timothy C. Hogan	1.70	\$550.00	\$935.00
Danter Rob	6.10	\$340.00	\$2,074.00
Sean Molnar	.50	\$150.00	\$75.00

TOTAL DUE & OWING **\$ 3,484.92**

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HARRISON PENSA LLP

Per: 

 Timothy C. Hogan

E. & O.E.

**Harrison Pensa LLP is a registered payee with most Canadian banks.
 Payment can be made online through your bank's website or mobile app.**

GST / HST REGISTRATION NO: R867630543

Interest of 4.8% is charged based on the Courts of Justice Act at time of billing on all invoices over 30 days

**TERMS: DUE UPON RECEIPT
 Cheque, Mastercard and VISA also accepted.**

Please make cheque payable to:
 HARRISON PENSA LLP, 130 Dufferin Ave., Suite 1101, P.O. Box 3237, London ON N6A 4K3

THE TORONTO-DOMINION BANK

Applicant

-and-

INJECTION TECHNOLOGIES INC., et al.

Respondents

Court File No. CV-23-00699663-00CL

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

Proceeding commenced at
Toronto, Ontario

AFFIDAVIT OF THOMAS MASTERSON

Harrison Pensa ^{LLP}
Barristers and Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)
Tel: (519) 679-9660
Fax: (519) 667-3362

Solicitors for the Receiver,
Deloitte Restructuring Inc.

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

SECOND REPORT OF THE RECEIVER

HARRISON PENZA ^{LLP}
Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

Tel : (519) 679-9660
Fax: (519) 667-3362
Email: thogan@harrisonpensa.com
rdanter@harrisonpensa.com

Lawyers for the Receiver,
Deloitte Restructuring Inc.

THE TORONTO-DOMINION BANK

v.

INJECTION TECHNOLOGIES INC., et al.

Applicant

Respondents

Court File No. CV-23-00699663-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT
TORONTO, ONTARIO

MOTION RECORD OF THE RECEIVER

HARRISON PENZA ^{LLP}

Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, Ontario N6A 5R2

Timothy C. Hogan (LSO #36553S)
Robert Danter (LSO #69806O)

Tel : (519) 679-9660

Fax: (519) 667-3362

Email: thogan@harrisonpensa.com
rdanter@harrisonpensa.com

Lawyers for the Receiver,
Deloitte Restructuring Inc.