

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

JAGDEEP SANGHA TRANSPORT INC.

Plaintiff

and

DAIMLER TRUCK FINANCIAL SERVICES CANADA CORPORATION

Defendant

A N D B E T W E E N:

DAIMLER TRUCK FINANCIAL SERVICES CANADA CORPORATION

Plaintiff by Counterclaim

and

JAGDEEP SANGHA TRANSPORT INC. and LAKHVIR SANGHA

Defendants by Counterclaim

**SECOND SUPPLEMENTAL AFFIDAVIT OF MOHAMMAD ABU-QUBE
(sworn September 30, 2025)**

I, Mohammad Abu-Qube, of the Town of Milton, in the Province of Ontario, MAKE OATH
AND SAY AS FOLLOWS:

1. I am a Manager in the Collections and Loss Recovery group of Daimler Truck Financial Services Canada Corporation (“**Daimler**”)¹. As such, I have personal knowledge of the

¹ Daimler was formerly known as Daimler Truck Financial, a business unit of Mercedes-Benz Financial Services Canada Corporation.

matters to which I hereinafter depose except where I have otherwise indicated and in which case I verily believe the facts deposed to be true.

2. I previously swore affidavits in this matter on September 15, 2025 (the “**First Abu-Qube Affidavit**”) and September 25, 2025 (the “**Second Abu-Qube Affidavit**”). Capitalized terms used and not otherwise defined herein are defined in the First Abu-Qube Affidavit.
3. As with the First Abu-Qube Affidavit and the Second Abu-Qube Affidavit, this supplemental affidavit is sworn in support of Daimler’s motion for the appointment of Deloitte as Receiver over certain of the Debtor’s Property, including but not limited to the Outstanding Vehicles.
4. Daimler’s motion was brought before the Court on an urgent basis and has now been scheduled for October 1, 2025.


RESPONSE TO THE RESPONDENT’S AFFIDAVITS


5. I have reviewed the fourteen (14) affidavits that were provided by the Respondent at approximately 6:44pm on September 30, 2025 (the “**Respondent’s Affidavits**”). Given the limited time available to prepare a response in advance of the upcoming hearing, I have not addressed each and every assertion made in the Responding Affidavits. However, the Respondent’s Affidavits contain incorrect assertions that are material to the relief sought by Daimler in the within motion, which I have corrected below:

- (a) Daimler is not in possession of any of the Outstanding Vehicles.

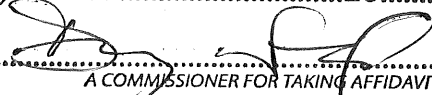
- (b) On September 30, 2025, I communicated with Nicole Neufeld, Strategic Accounts Manager, of Ritchie Brothers Auctioneers (“**Ritchie Bros**”) to inquire about the status of the Outstanding Vehicles. Ms. Neufeld informed me that Ritchie Bros. is not in possession of any of the Outstanding Vehicles and has not assigned anyone to seize them. A copy of my email exchange with Ms. Neufeld is attached hereto as **Exhibit “A”**.
- (c) Daimler has no commercial relationship with Dynamic Coast Equipment and they are not the “Lessor” of the Outstanding Vehicles. I do not recognize this company.
6. I swear this affidavit in support of Daimler’s motion for the appointment of a Receiver in the within action and for no other or improper purpose.

SWORN by Mohammad Abu-Qube of the Town of Milton, in the Province of Ontario, before me at the City of **TORONTO** the Province of Ontario on September 30, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.


A Commissioner for Taking Affidavits, etc.
Danny M. Nunes
(LSO #53802D)


MOHAMMAD ABU-QUBE

This is Exhibit A referred to in the
affidavit of ROHANNIA ABU-ALBE
sworn before me, this 30
day of SEPTEMBER 2025


A COMMISSIONER FOR TAKING AFFIDAVITS
Danny M. Nunes
(LSO #53802D)

Danny Nunes

Subject: FW: Urgent help please

From: Nicole Neufeld <nneufeld@ritchiebros.com>
Sent: Tuesday, September 30, 2025 10:26 PM
To: Abu-Qube, Mohammad (713) <mohammad.abu-qube@daimlertruck.com>; Diego Rodriguez Aguilar <droduguez@ritchiebros.com>
Cc: Crossland, Graham (713) <graham.crossland@daimlertruck.com>
Subject: RE: Urgent help please

We don't have these,

We wouldn't seize property.

Nicole Neufeld
Strategic Accounts Manager
1-604-785-5342 | nneufeld@ritchiebros.com



From: Abu-Qube, Mohammad (713) <mohammad.abu-qube@daimlertruck.com>
Sent: Tuesday, September 30, 2025 2:24 PM
To: Nicole Neufeld <nneufeld@ritchiebros.com>; Diego Rodriguez Aguilar <droduguez@ritchiebros.com>
Cc: Crossland, Graham (713) <graham.crossland@daimlertruck.com>
Subject: Urgent help please

Hi Nicole and Diego,

Hope all is well!

We have a court case to attend tomorrow, and we need your help to confirm if RB has possession of the below units or not (Customer is claiming that RB sent a bailiff and seized those units):

3H3V532K5NS340030
3H3V532K9NS340029
3H3V533COMT714009
1UYVS2536J2198394
1UYVS2534J2369210
3AKJHHDR7NSNE3056
2SHSR5329PS002083
3AKJHHDR9RSUU8217
1UYVS3539M2014236

1UYVS3535M2014234
1UYVS3536M2014243
1UYVS3534M2014242
3H3V533C7MT714007
1UYVS3537M2014235
3H3V533C9MT714011

Thank you.

Regards,

Moe Qube

Manager, Collections & Loss Recovery

Daimler Truck Financial Services Canada Corporation

2680 Matheson Blvd. East, Suite 202

Mississauga, ON L4W 0A5

Tel: 416-459-9380

Fax: 833-902-3858

Email: Mohammad.Abu-Qube@daimlertruck.com

www.daimler-truckfinancial.ca

DAIMLER TRUCK

Financial Services

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JAGDEEP SANGHA TRANSPORT INC.

-and- **DAIMLER TRUCK FINANCIAL SERVICES CANADA
CORPORATION**

Plaintiff / Defendant by Counterclaim

Defendant / Plaintiff by Counterclaim

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT BRAMPTON

**SECOND SUPPLEMENTAL AFFIDAVIT OF
MOHAMMAD ABU-QUBE**

CAPSTONE LEGAL
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Tel: (416) 414-3311
Email: dn@capstonelegal.ca

**Lawyers for Daimler Truck Financial Services Canada
Corporation**