

**ONTARIO
SUPERIOR COURT OF JUSTICE
[COMMERCIAL LIST]**

B E T W E E N:

OWEMANCO MORTGAGE HOLDING CORPORATION

Applicant

- and -

SYRION CORPORATION

Respondent

Application pursuant to s. 243 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

**SUPPLEMENT TO THE SECOND REPORT OF ROSEN GOLDBERG INC.,
IN ITS CAPACITY AS COURT-APPOINTED RECEIVER
OF SYRION CORPORATION
(September 6, 2018)**

(filed in connection with the Chambers motion returnable September 11, 2018 @ 8:30am)

September 6, 2018

LOOPSTRA NIXON LLP
135 Queens Plate Drive – Suite 600
Toronto, ON M9W 6V7

R. Graham Phoenix (LSUC # 52650N)
Tel: (416) 748-4776
Fax: (416) 746-8319
Email: gphoenix@loonix.com

*Lawyers for Rosen Goldberg Inc., the Court-
Appointed Receiver*

TO: THE ATTACHED SERVICE LIST

SERVICE LIST
(as at September 4, 2018)

GOLDMAN SLOAN NASH & HABER LLP 480 University Avenue, Suite 1600 Toronto, Ontario M5G 1V2 Fax: 416-597-6477 R. Brendan Bissell Tel: 416.597.6489 Email: bissell@gsnh.com <i>Lawyers for the Owemanco Mortgage Holding Corporation</i>	LOOPSTRA NIXON LLP 135 Queen's Plate Drive – Suite 600 Toronto, ON M9W 6V7 R. Graham Phoenix P: 416-478-4776 F: 416-476-8319 E: gphoenix@loonix.com <i>Lawyers for Rosen Goldberg Inc., the court-appointed Receiver</i>
SYRION CORPORATION 800 Petrolia Road, Unit 3 Toronto, ON M3J 3K4 – <i>Registered business address</i> & 2300 Yonge Street, Suite 1600 Toronto, ON M4P 1E4 – <i>Address for Service in the registered Charge</i> & c/o Irina Stalevskaya, President 1509-100 Quebec Avenue Toronto, ON M6P 4B8 & 904-22 Oakmount Road Toronto, ON M6P 2M7 Attention: Irina Stalevskaya, President T: 647-388-8304 E: istalevskaya@yahoo.com	IRINA STALEVSKAYA 1509-100 Quebec Avenue Toronto, ON M6P 4B8 & 904-22 Oakmount Road Toronto, Ontario M6P 2M7 Attention: Irina Stalevskaya T: 647-388-8304 E: istalevskaya@yahoo.com
DJD LAW PROFESSIONAL CORPORATION 1186 Eglinton Avenue West Toronto, Ontario M6C 2E3 Attention: Eli Karp T: 647-260-4863 F: 416-352-7638 E: ek@djdlaw.ca <i>Lawyer for the respondent, Syrion Corporation; and Irina Stalevskaya</i>	MORGANTI & CO., P.C. 1 Yonge Street, Suite 1506 Toronto, ON M5E 1E5 Attention: Eli Karp T: (647) 344-1900, ex. 2 E: ekarp@morgantilegal.com <i>Lawyer for the respondent, Syrion Corporation; and Irina Stalevskaya</i>

SERGUEI FEDOTOV c/o Melconian Law Office 1140 - 3280 Bloor Street West Centre Tower Toronto, Ontario M8X 2X3 Attention: Leon J. Melconian T: 416-601-0205 F: 416-601-0206 E: leon@melconianlaw.com	VINELL AMABELLE PITT 63 Balmoral Avenue Toronto, ON M4V 1J5 c/o Mr. Romain Pitt E: romain.pitt@sympatico.ca
VINELL AMABELLE PITT c/o Leroy A. Crosse Law Office 203-705 Lawrence Ave. W. North York, ON M6A 1B4 Attention: Leroy A. Crosse T: 416-785-8338 F: 416-785-9369 E: fortroc@on.aibn.com	GIUSEPPINA HOWE 202 Park Drive North Stouffville, ON L4A 1J8 Attention: Giuseppina Howe T: 416-891-4077 E: josihowe@live.ca
GIUSEPPINA HOWE c/o Tucci Professional Corporation 9401 Jane Street, Unit 118 Vaughan, Ontario L6A 4H7 Attention: Gregorio Tucci T: 905-605-1766 F: 647-723-7565 E: gtucci@tuccilawyers.com	GIORGIO ARGENTINI 8854 Yonge Street Richmond Hill, Ontario L4C 0T4 Attention: Giorgio Argentini T: 416-948-2534 E: Gargentini@sympatico.ca
BLK BUILDERS CORP. 33 Harbour Square # 2019 Toronto, Ontario M5J 2G2 Attention: Boris Katz T: 416-875-1245 E: blkbuilders1@gmail.com	ROSEN GOLDBERG INC. 5255 Yonge Street, Suite 804, Toronto, Ontario, M2N 6P4 Attention: Brahm Rosen T: 416-224-4200 E: brosen@rosengoldberg.com
DEPARTMENT OF JUSTICE The Exchange Tower 130 King Street West, Suite 3400 Toronto, ON M5X 1K6 Attention: Diane Winters P: 416-973-3172 F: 416-973-0810 E: diane.winters@justice.gc.ca <i>Lawyers for Canada Revenue Agency</i>	HER MAJESTY THE QUEEN IN RIGHT OF THE PROVINC OF ONTARIO AS REPRESENTED BY THE MINISTER OF FINANCE Ministry of Finance 33 King Street West Oshawa, Ontario, Canada L1H 8H5 Attention: Kevin J. O'Hara T: 905-433-6934 F: 905-436-451 E: kevin.ohara@ontario.ca

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**ONTARIO
SUPERIOR COURT OF JUSTICE
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B E T W E E N:

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Applicant

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**SUPPLEMENT TO THE SECOND REPORT OF ROSEN GOLDBERG INC.,
IN ITS CAPACITY AS COURT-APPOINTED RECEIVER
OF SYRION CORPORATION
(September 6, 2018)**

INDEX

TAB	DOCUMENT
1	Supplement to the Second Report of Rosen Goldberg Inc., in its capacity as Court-Appointed Receiver, dated September 6, 2018
A	Appendix “A” to the Supplement – Receiver’s calculation of anticipated distribution
B	Appendix “B” to the Supplement – Affidavit of Fees of the Receiver
C	Appendix “C” to the Supplement – Affidavit of Fees of Counsel to the Receiver

TAB 1



ROSEN GOLDBERG
INSOLVENCY & RESTRUCTURING

Court File No. CV-18-599087-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

**IN THE MATTER OF SECTION 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**

BETWEEN:

OWEMANCO MORTGAGE HOLDING CORPORATION

Applicant

- and -

SYRION CORPORATION

Respondents

SUPPLEMENT TO THE SECOND REPORT OF ROSEN GOLDBERG INC.

I. INTRODUCTION

1. By Order of the Honourable Mr. Justice McEwen dated June 14, 2018 (the “**Appointment Order**”), Rosen Goldberg Inc. was appointed receiver (the “**Receiver**”) over real property known municipally as 61 Balmoral Avenue in Toronto, Ontario. (the “**Property**”), then-owned by the Respondent, Syrion Corporation (“**Syrion**”). A copy of the Appointment Order is the Second Report of



the Receiver, dated August 31, 2018 (the “Second Report”), previously served and filed with this Honourable Court.

II. PURPOSE OF THIS REPORT

2. The purpose of this supplement to the Second Report (this “**Supplement**”) is to provide additional information to this Honourable Court, as a supplement to the Second Report, in accordance with the Endorsement of the Honourable Mr. Justice Morawetz dated August 15, 2018 and to continue our request that the Court grant an order, *inter alia*, approving a distribution to the senior secured creditor, approving professional fees and discharging the Receiver, in the form of the draft discharge order appended as Schedule “B” to the Receiver’s notice of motion originally returnable in these proceedings on August 15, 2018 .

III. TERMS OF REFERENCE

3. Capitalized terms not otherwise defined herein, shall have the meanings ascribed thereto in the Second Report.

4. In preparing this Supplement, the Receiver has relied upon information from third party sources (collectively, the “**Information**”). Certain of the information contained herein may refer to, or be based on, the Information. As the Information has been provided by other parties or obtained from documents filed with the Honourable Court in this matter, the Receiver has relied on the Information and, to the extent possible, reviewed the Information for reasonableness. However, the Receiver has not audited or



otherwise attempted to verify the accuracy and completeness of the Information in a manner that would wholly or partially comply with Generally Accepted Assurance Standards pursuant to the CPA Canada Handbook.

IV. BACKGROUND; ACTIVITIES OF RECEIVER; SALE

5. The Second Report contains a background to these proceedings, an update on the activities of the Receiver and details of the sale of the Real Property, which closed on August 24, 2018. The same is not repeated here.

V. SUPPLEMENTAL INFORMATION

Anticipated Distribution

6. This Supplement and the Second Report are filed in furtherance of the Receiver's request for an order authorizing a distribution of funds on hands to OWEMENCO Mortgage Holding Corporation ("OW"). Attached hereto as **Appendix "A"** is the Receiver's schedule calculating the amount available for distribution in these proceedings. This schedule reflects (a) a reduction to the OW's claim amount for interest claimed under the *Mortgages Act* which does not apply and (b) a revised/reduced "Accrual Amount" for legal fees (as discussed below).

7. As set out in the attached distribution schedule, OW a will suffer an approximate shortfall of \$35,000 in respect of its mortgage loan to Syron.



Professional Fees

8. As set out in the First Report of the Receiver dated August 2, 2018 (the “**First Report**”) and the fee affidavits of the Receiver and its counsel, Loopstra Nixon LLP (“**LN**”), the Receiver’s fees as of August 1, 2018 were \$10,788.00, exclusive of tax; and, LN’s fees as of August 1, 2018 were \$4,670, exclusive of applicable taxes.

9. At the time of First Report, an accrual amount was contemplated for professional fees to complete the Receiver’s administration. This number can now be updated. Moreover, a portion of the accrual amount was in respect of legal the closing of the transaction for the Real Property, which legal services were ultimately performed by Andrew Piggott Professional Corporation for the Receiver, at the request of OW and agreed to by the Receiver. Such fees are being paid directly by OW and are not being billed to the administration.

10. For the period August 2, 2018 through September 5, 2018, the fees and disbursements of the Receiver amount to \$4,479 (exclusive of HST and disbursements). The fee affidavit of Brahm Rosen to that effect is attached hereto as **Appendix “B”**.

11. For the period August 2, 2018 through September 5, 2018, the fees and disbursements of the LN amount to \$8,425 (exclusive of HST and disbursements). The fee affidavit of R. Graham Phoenix to that effect is attached hereto as **Appendix “C”**.

12. The Receiver now estimates that there will be further costs and fees (including legal fees and disbursements) of not more than \$ 9,000 (the “**Accrual Amount**”) to complete its administration as set out in the First Report and Second Report.



ROSEN GOLDBERG
INSOLVENCY & RESTRUCTURING

13. Accordingly, the Receiver requests the approval of not only the fees and disbursements as set out in the affidavits attached hereto but also of the Accrual Amount on account of fees and disbursement through completion of its Administration (including the finalizing of the relief sought herein, the distribution contemplated hereby, the filing of HST returns and the recovery of any possible tax refunds with the balance of such amount to be distributed to OW on account of the any outstanding indebtedness of Syrion to OW.

VI. DISCHARGE

14. Once the Receiver pays all approved professional fees, completes the distribution described above, and completes those the actions set out in its First Report and Second Report, its administration will be complete, and it respectfully requests that this Honourable Court order the Receiver's discharge in that regard.

All of which is respectfully submitted,

Dated at Toronto, Ontario, this 6th day of September 2018.

**ROSEN GOLDBERG INC., SOLELY IN ITS CAPACITY AS
COURT-APPOINTED RECEIVER OF
SYRION CORPORATION**

APPENDIX “A”

Rosen Goldberg Inc., Court Appointed Receiver and Manager of
Syrion Corporation
Calculation of amount available for distribution
Prepared September 5, 2018

Proceeds on sale	2,300,000
HST Collected	<u>299,000</u>
	2,599,000
Less:	
CRA-deemed trust	20,000
HST to be paid	245,000
Receiver's fees to date(inclusive of HST)	16,130
Legal fees to date (inclusive of HST)	15,240
Real estate commission	12,110
Accounts payable of receiver (appraisal, repairs)	10,000
Professional fees to complete administration	<u>9,000</u>
	327,480
Amount available for distribution	2,271,520
Amount owing under OW Mortgage (see below)	2,306,079
Shortfall to OW	<u><u>(34,559)</u></u>
Balance per statement as of August 2, 2018	2,326,419
add: per diem interest to September 11, 2018(\$619.53)	24,781
Protective disbursements and costs	10,944
Less: three months interest bonus per section 17 of Mortgages Act	<u>(56,065)</u>
	2,306,079

APPENDIX “B”

IN THE MATTER OF THE RECEIVERSHIP OF
SYRION CORPORATION

AFFIDAVIT OF FEES

I, Brahm Rosen, Chartered Professional Accountant and Licensed Trustee in Bankruptcy, of the City of Toronto, Province of Ontario, make oath and say as follows:

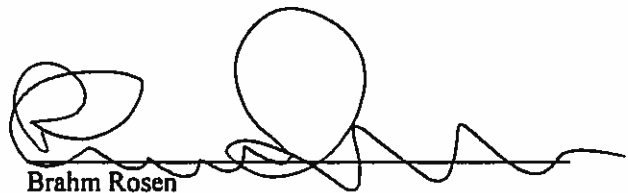
1. I am President of Rosen Goldberg Inc., the Receiver of the above mentioned estate, and as such have knowledge of the administration.
2. The total time charges of the Receiver relating to the administration of the estate amounted to \$4,479.00, exclusive of HST, as of September 5th, 2018.
3. Attached as Exhibit "A" and "B" to this Affidavit are schedules of time spent with standard rates of those employed by the Receiver for the period from August 2nd to September 5th, 2018 in its capacity as Receiver and a summary of services rendered, which describes in detail the services rendered by the Receiver in connection with the administration of the estate.

DATED at Toronto, Ontario this 6th day of September 2018.

SWORN before me at the
City of Toronto, Province of Ontario,
this 6th day of September 2018.



A commissioner, etc.

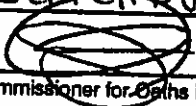

Brahm Rosen

Julie Elia Schincariol, a Commissioner, etc.,
Province of Ontario, for Rosen Goldberg Inc.
Expires September 25, 2020

This is Exhibit - A - referred to
in the Affidavit of

BRAHM ROSEN

Sworn before me this 6th day
of SEPTEMBER, 2018


A Commissioner for Oaths in and for Ontario

Julie Elissa Schincariol, a Commissioner, etc.,
Province of Ontario, for Rosen Goldberg Inc.
Expires September 25, 2020.

Exhibit "A"

Court File No. CV-18-599087-00CL

**IN THE MATTER OF THE RECEIVERSHIP OF
SYRION CORPORATION**

**Summary of Total Time Charges
For the Period of August 2, 2018 to September 5, 2018**

B. Rosen	7.57	hrs at	\$ 490.00 /hr	\$ 3,709.00
J. Schincariol	3.25	hrs at	\$ 200.00 /hr	\$ 650.00
N. Mammoliti	1.50	hrs at	\$ 80.00 /hr	\$ 120.00

Total time charges	<u>12.32</u>	<u>\$ 4,479.00</u>
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**IN THE MATTER OF THE RECEIVERSHIP OF
SYRION CORPORATION**

**Summary of Services Rendered by Rosen Goldberg Inc. in its capacity of Receiver of
Syrion Corporation
For the Period of August 2, 2018 to September 5, 2018**

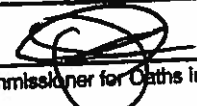
Last Name	Date	Description	Hours	Fees
Rosen	08/02/2018	dealing with finalizing first report	1.10	539.00
Rosen	08/03/2018	call with Graham Tobe; call with Aron Davidson	0.50	245.00
Rosen	08/08/2018	call with CRA	0.20	98.00
Schincariol	08/08/2018	Prepare schedule of HST Input Tax Credits and assemble back-up documentation.	2.00	400.00
Rosen	08/09/2018	call with Graham Phoenix; assignment agreement	0.16	78.40
Schincariol	08/09/2018	Review additional documentation re: Invoices for ITC's and business number. Letter to CRA with GST10 form, and court order requesting GST/HST number.	1.00	200.00
Rosen	08/12/2018	email communications with Graham Phoenix re email received from subsequent ranking creditor; email from and to Aron Davidson	0.16	78.40
Rosen	08/13/2018	call from creditor; correspondence from CRA; call with Aron Davidson	0.20	98.00
Rosen	08/14/2018	various emails between Graham Phoenix and Brendan Bissell re August 15, 2018 motion	0.60	294.00
Rosen	08/15/2018	call with Graham Tobe re motion and issue re Pitt judgement; call and emails with Graham Phoenix re motion; review order and endorsements; review invoices from OW statement	0.50	245.00
Rosen	08/21/2018	Andrew Piggott re closing; discuss w Julie Shincariol re HST filing	0.20	98.00
Rosen	08/22/2018	emails from and to Graham Phoenix ; review closing docs	0.25	122.50

Last Name	Date	Description	Hours	Fees
Rosen	08/23/2018	closing documents; emails from and to Graham Phoenix; emails from and to Graham Tobe; email from and to Andrew Piggot re receiver's certificate	1.00	490.00
Rosen	08/26/2018	SRD	0.40	196.00
Di Pede-Mammoliti	08/27/2018	Received email from Brahm to confirm wire payment for sale of property was received. Contact Tyler @ BMO he confirmed verbally and also via email with print screen shot of receipt. Entered amount in Ascend a prepared request to purchase GIC. Sent fax to BMO investment department to process request. received GIC certificate entered Term Deposit (GIC) into Ascend and updated Log.	1.50	120.00
Rosen	08/27/2018	distribution schedule; finalize draft report	1.40	686.00
Schincariol	08/27/2018	PPSA search. Scanned and saved.	0.25	50.00
Rosen	08/29/2018	call with Graham Tobe; call with Graham Phoenix; review changes to report	0.50	245.00
Rosen	08/30/2018	call with Graham Tobe	0.10	49.00
Rosen	08/31/2018	discussion with Eli Karp	0.10	49.00
Rosen	09/03/2018	finalize second report	0.20	98.00
			12.32	4479.30

This is Exhibit " B " referred to
in the Affidavit of

BRAHM ROSEN

Sworn before me this 6th day
of SEPTEMBER, 20 18


A Commissioner for Oaths in and for Ontario

Julie Elia Schincariol, a Commissioner, etc.
Province of Ontario, for Rosen Goldberg Inc
Expires September 25, 2020.

APPENDIX “C”

**ONTARIO
SUPERIOR COURT OF JUSTICE
[COMMERCIAL LIST]**

B E T W E E N:

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Applicant

- and -

SYRION CORPORATION

Respondent

Application pursuant to s. 243 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

**AFFIDAVIT OF R. GRAHAM PHOENIX
(Affirmed September 6, 2018)**

I, R. GRAHAM PHOENIX, of the City of Toronto, in the Province of Ontario,
AFFIRM AND SAY:

1. I am a partner in the law firm of Loopstra Nixon LLP ("Loopstra Nixon"),
solicitors to Rosen Goldberg Inc., in its capacity as Court-appointed receiver (the "Receiver") in
the within proceedings. Accordingly, I have knowledge of matters hereinafter deposed to.

2. Attached hereto as Exhibit "A" is a true copy of the Statement of Account of
Loopstra Nixon in respect of services rendered to the Receiver for the period from August 2, 2018
through September 6, 2018 (the "Billing Period"). During the Billing Period, the total fees billed

were \$8,425.00, plus disbursements of \$376.14 and applicable taxes of \$1,123.35, for an aggregate amount of \$9,924.49.

3. As set out in the following table, 25.1 hours were billed by Loopstra Nixon during the Billing Period, resulting in an average hourly rate after all discounts of \$335.65 (exclusive of applicable taxes):

Name of Professional	Total Hours	Hourly Rate (\$)
R.G. Phoenix (2006)	20.7	475
S. Radovanovich (2015)	0.3	275
K. Ruston (2017)	4.1	250

4. I am the professional first listed above and confirm that the activities detailed in the statements of account attached hereto as Exhibit "A" accurately reflect the services provided by Loopstra Nixon; and, that the rates charged are the standard hourly rates for each such professional at the time that such charges were incurred.

5. In anticipation of us completing the motion on behalf of the Receiver in these proceedings for the approval of, *inter alia*, a distribution to the senior secured creditor and the discharge of the Receiver, and in contemplation of those administrative elements required to complete the receivership, Loopstra Nixon estimates a fee accrual of not more than \$2,500, excluding disbursements and taxes (the "Fee Accrual"), through to the completion of the receivership and discharge of the Receiver.

6. I swear this affidavit in support of a motion for, *inter alia*, approval of the fees and disbursements of Loopstra Nixon, including the Fee Accrual, and for no other or improper purpose.

AFFIRMED BEFORE ME at the
City of Toronto, in the
Province of Ontario, this
6th day of September, 2018

A Commissioner for taking affidavits, etc.

Derek Van Doorn


R. GRAHAM PHOENIX

LOOPSTRA NIXON LLP

BARRISTERS AND SOLICITORS



Rosen Goldberg Inc.
5255 Yonge Street, Suite 804
Toronto, ON
M2N 6P4

Attention: Brahm Rosen

September 6, 2018

Re: **Syrion Corporation**
Our File No.: RGOL003

This is Exhibit A referred to in the
affidavit of R.G. Phoenix
sworn before me, this 6th
day of September 2018

A COMMISSIONER FOR TAKING AFFIDAVITS

STATEMENT OF ACCOUNT

TO OUR FEE FOR PROFESSIONAL SERVICES rendered in connection with the above-noted matter from August 2, 2018 to September 6, 2018 as per the attached billing detail report.

OUR FEE IN ALL	\$10,940.00
Courtesy Discount	(\$2,515.00)
Total Fees	\$8,425.00
HST on fees @ 13%	<u>\$1,095.25</u>

DISBURSEMENTS (E=HST exempt)

Paid for Photocopies	\$5.00
Paid for KAP Litigation Services	\$62.50
Paid for Courier	\$56.64
Paid for Transcripts	\$92.00
Paid for Filing Fee	\$160.00 (E)
HST on disbursements @ 13%	<u>\$28.10</u>

Total Fees and Disbursements	\$8,801.14
Total HST	<u>\$1,123.35</u>

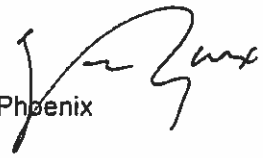
TOTAL AMOUNT DUE AND OWING: **\$9,924.49**

The above account represents a summary of the professional services rendered to you, and this firm reserves the right to provide further particulars of our professional services rendered in the event the same is required or requested.

THIS IS OUR STATEMENT OF ACCOUNT HEREIN

LOOPSTRA NIXON LLP

Per:


Graham Phoenix
RGP/sr
E & O.E.

(L1128893) In accordance with the Solicitor's Act, Interest will be charged on this account until paid, at the rate of 2 % per annum, commencing one month after delivery, E & O.E. • HST No. R122610298

Woodbine Place, 135 Queens Plate Drive, Suite 600, Toronto, Ontario, Canada M9W 6V7
Tel: 416.746.4710 Fax: 416.746.8319 loopstranixon.com

LawExchange
INTERNATIONAL

LOOPSTRA NIXON LLP

BARRISTERS AND SOLICITORS



R. Graham Phoenix
Tel: (416) 748-4776
Email: gphoenix@loonix.com

September 6, 2018
File No. RGOL003

PRIVATE & CONFIDENTIAL

SENT BY EMAIL (brosen@rosengoldberg.com)

Rosen Goldberg Inc.
5255 Yonge Street, Suite 804
Toronto, ON
M2N 6P4
Attention: Brahm Rosen

Dear Mr. Rosen,

RE: Syrion Corporation

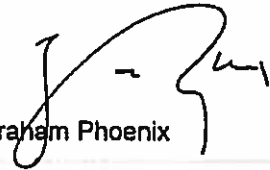
Please find enclosed our statement of account for services rendered with respect to the above-noted matter through September 6, 2018. We have applied a courtesy discount to our services, which we trust you will find satisfactory.

If you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours very truly,

LOOPSTRA NIXON LLP

Per:


R. Graham Phoenix

RGP/sr
Encl.

LOOPSTRA NIXON LLP

BARRISTERS AND SOLICITORS



RE: Billing Detail Report from August 2, 2018 to September 6, 2018
Syrion Corporation
Our File No.: RGOL003

Date	Narrative	Lawyer	Time
02 Aug 18	Finalize and deliver security review. Finalize drafts of all motion materials and comments on first report and forward to client. Emails with client. Finalize affidavit of fees.	RGP	1.60
03 Aug 18	Revised notice and draft order orders. Finalize motion materials for service. Instructions to clerk re: service of same. Emails with Purchaser's counsel re: vesting order and offer to purchase issue.	RGP	1.70
07 Aug 18	To office correspondences with G. Phoenix re: title question	SMR	.30
07 Aug 18	Emails with purchaser re: concerns and vesting.	RGP	.50
08 Aug 18	Draft assignment agreement re: APS (per purchaser's counsel's comments). Amended APV re same. Prep closing agenda. Directions to Associated re: preparation for closing.	RGP	1.10
09 Aug 18	Emails with purchaser's lawyer. Revised APV and assignment agreement. Forward the same to purchaser for execution. Emails with receiver re: same.	RGP	1.20
10 Aug 18	Revised APV. Emails with service list re: same. Emails with trustee re: same and assignment agreement.	RGP	1.10
11 Aug 18	Detailed emails with second mortgagee and receiver re: hearing and second mortgage's position. Review filings. Email to second mortgagee.	RGP	1.10
12 Aug 18	Review prior filings and draft orders. Forward confidential report to representative for second mortgagee.	RGP	.90
13 Aug 18	To preparation of closing agenda and closing documents.	KAH	3.70
14 Aug 18	To instructions to S. Radanovich and preparation of closing documents.	KAH	.20
14 Aug 18	Review affidavit of Pitt litigant. Email to Receiver and counsel to first secured. Preparation for motion.	RGP	1.60
15 Aug 18	To discussion with G. Phoenix re: outstanding items, to correspondence with	KAH	.20



	A. Pigott re: closing.		
15 Aug 18	Attend motion re: approval and vesting order. Judge had concerns re: mortgagee statement. Part-relief granted. Reporting email to client and mortgagee. Email to Mr. and Mrs. Pitt. Emails with receiver re: closing mechanics. Emails to purchaser the same.	RGP	4.60
22 Aug 18	Review CRA notice. Forward to receiver. Emails with Receiver re: next steps and closing.	RGP	.50
24 Aug 18	Email to service list re: endorsement of Morawetz J.	RGP	.10
27 Aug 18	Review and amend draft report re: legal costs.	RGP	.50
28 Aug 18	Review and comment on draft report. Corresponding with court office re: dates. Reporting email to client.	RGP	1.10
30 Aug 18	Comment to Receiver re: court order and report status. Call with B. Bissell re: same.	RGP	.20
04 Sep 18	Drafting covering letter to service list re: strategy on motion. Finalize all materials for service. Direction to clerk re: service of the same.	RGP	1.40
05 Sep 18	Draft supplement to second report. Forward to Receiver for consideration.	RGP	1.50

To all other services and attendances on you and to all other necessary and incidental attendances in connection with the matter.

OWEMANCO MORTGAGE HOLDING CORPOORAION
Applicant

-and-

SYRION CORPORATION
Respondent

Application pursuant to s. 243 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

Court File No. CV-16-11399-CL

ONTARIO
SUPERIOR COURT OF JUSTICE
[Commercial List]

Proceedings commenced at Toronto

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*Lawyers for Rosen Goldberg Inc.,
the Court-appointed Receiver*

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Court File No. CV-18-599087-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
[Commercial List]

Proceedings commenced at Toronto

SUPPLEMENT TO THE SECOND
REPORT OF ROSEN GOLDBERG
INC., IN ITS CAPACITY AS COURT-
APPOINTED RECEIVER
OF SYRION CORPORATION
(September 6, 2018)

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