

**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**

B E T W E E N:

HOMEDALE-EAGLE CORPORATION

Applicant

- and -

253 QUEEN STREET INC.

Respondent

AIDE MEMOIRE OF THE COURT-APPOINTED RECEIVER
(for Judicial Scheduling Appointment on September 8, 2026 at 9:30 a.m.)

September 4, 2026

DICKINSON WRIGHT LLP

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TO: SERVICE LIST

PART I – Purpose of Scheduling Appointment

1. Rosen Goldberg Inc., the Court-appointed receiver and manager (in such capacities, the **“Receiver”**) of the lands and premises owned by 253 Queen Street Inc. (the **“Debtor”**) municipally known as 253 Queen Street East, in Brampton, Ontario (the **“Property”**), seeks to schedule a motion for an Order, among other things:
 - a. approving the distribution from the remaining net proceeds from the sale of the Property (the **“Net Proceeds”**) first to Canada Revenue Agency to satisfy its claim for unpaid HST, penalties and interest (the **“HST Claim”**) and, upon payment to CRA and payment of the remaining unpaid fees and disbursements of the Receiver and its counsel, approval to distribute the remaining Net Proceeds to Osler, Hoskin & Harcourt LLP (**“Osler”**), in trust;
 - b. the discharge and release of the Receiver.

PART II - Background

2. The Property was sold pursuant to the November 26, 2024, Approval and Vesting Order of Justice McNeil. Following the sale, the Receiver distributed funds to the first- and second-ranking secured creditors in satisfaction of their charges, save for the second creditor’s claim of an acceleration charge, which the Receiver did not pay.
3. This proceeding was subsequently transferred to the Commercial List pursuant to the November 25, 2025, Order of Justice Kimmel.

PART III – Claims Process

4. In July 2025, the Receiver delivered its Third Report, outlining the proposed claims process (the “**Claims Process**”) which it recommended be implemented before distributing the Net Proceeds.
5. Following the delivery of the Third Report, a dispute arose between the majority equity holder in the Debtor, TriDelta, and the Debtor, represented by its minority equity holder and sole officer and director, Mohammad Mahdi Tajbakhsh, with respect to the entitlement to the Net Proceeds. This dispute has now been resolved, and the Receiver has received a signed direction to pay the remaining Net Proceeds to Osler, counsel for TriDelta, in trust, following the payment of the HST Claim and the unpaid fees and disbursements of the Receiver and its counsel.
6. Following the resolution of the dispute between TriDelta and the Debtor, the Receiver sought approval of the Claims Process, which was granted pursuant to the June 24, 2026, Order of Justice J. Dietrich. The Receiver has now conducted the Claim Process. The sole claim in the Claims Process prior to the claims bar date was the HST Claim.
7. Other than the distribution to CRA and Osler, and certain remaining administrative tasks, the administration of this proceeding is substantially concluded. Accordingly, the Receiver seeks to schedule a motion for an Order, among other things:
 - a. approving its activities, its fees and those of its counsel;
 - b. approving a distribution to CRA in respect of the HST Claim;

- c. approving the distribution of the remaining Net Proceeds to Osler, following the distribution to the CRA and the payment of the unpaid fees and disbursements of the Receiver and its counsel; and
- d. following such distribution to Osler, the discharge and release of the Receiver.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 4th day of September 2026.

HOMEDALE-EAGLE CORPORATION
Applicant

-and- **253 QUEEN STREET INC.**
Respondent

Court File No. CL-26-00000068-0000

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PROCEEDING COMMENCED AT
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Inc.