

**SUPPLEMENTARY SECOND REPORT OF
ALBERT GELMAN INC.
AS RECEIVER AND MANAGER OF
AG (1000 & 1024 DUNDAS ST. E.) GP INC.,
AG (1000 & 1024 DUNDAS ST. E.) LP AND
AG (1000 & 1024 DUNDAS ST. E.) INC.**

JUNE 30, 2026

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

B E T W E E N:

MORRISON FINANCIAL MORTGAGE CORPORATION

Applicant

- and -

**AG (1000 & 1024 DUNDAS ST. E.) GP INC., AG (1000 & 1024 DUNDAS ST. E.) LP
AND AG (1000 & 1024 DUNDAS ST. E.) INC.**

Debtors

**APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND INSOLVENCY ACT*,
R.S.C. 1985, c. B-3, AS AMENDED, AND SUBSECTION 101 OF
THE *COURTS OF JUSTICE ACT*, R.S.O. 1990, c. C.43, AS AMENDED**

**SECOND SUPPLEMENTARY SECOND REPORT OF ALBERT GELMAN INC.
IN ITS CAPACITY AS RECEIVER AND MANAGER**

JUNE 30, 2026

I. INTRODUCTION AND PURPOSE

1. This report (the “**Second Supplementary Second Report**”) supplements the Second Report of the Receiver dated June 1, 2026 (the “**Second Report**”) and the Supplementary Second Report of the Receiver dated June 19, 2026 (the “**Supplementary Second Report**”).
2. Capitalized terms not defined in this Second Supplementary Second Report have the meanings given to them in the Second Report and the Supplementary Second Report.
3. This Second Supplementary Second Report is subject to the scope and terms of reference in the Second Report.

The Receiver’s Motion and the June 9 Endorsement

4. As noted in the Supplementary Second Report, the Second Report was filed with the Court in connection with a motion of the Receiver (the “**Receiver’s Motion**”) seeking an Order, *inter alia*:
 - a. authorizing the Receiver to terminate the lease agreement (the “**AAM Lease**”) in respect of Unit 1 of 1024 Dundas (the “**AAM Premises**”), as between AG LP, as landlord, and Ahmed Asset Management Inc. (“**AAM**”, a company controlled by Mohammed Ahmed (“**Ahmed**”), the principal of the Debtors), as tenant;
 - b. requiring all Persons (as defined in the Receivership Order), including, but not limited to, Ahmed and/or entities controlled by him, to remit to the Receiver all rents, deposits and/or other amounts received or owed within ten (10) days of the order being granted;
 - c. ordering certain disclosure to the Receiver as set out in the Second Report, within ten (10) days of the order being granted;
 - d. approving the Interim SRD;
 - e. approving the Second Report, including the actions, activities and conduct of the Receiver described therein; and
 - f. approving the fees and disbursements of the Receiver and its counsel, Robins Appleby LLP (“**RA**”), as set out in the Second Report.
5. The Receiver’s Motion, which was initially scheduled to be heard on June 9, 2026, was adjourned to July 10, 2026, as set out in the endorsement of the Honourable Justice Deitrich of the Court dated June 9, 2026 (the “**June 9 Endorsement**”). Among other things, the June 9 Endorsement set the following schedule:
 - a. Responding material to be delivered by no later than June 12, 2026;
 - b. Reply material to be delivered by the Receiver no later than June 19, 2026;

- c. Written interrogatories on the Receiver's report(s) and cross examination, if any, on affidavit evidence to be completed by June 26, 2026;
 - d. Receiver's factum to be amended and restated by no later than June 30, 2026;
 - e. Responding facta to be delivered no later than July 6, 2026; and
 - f. Reply factum, if any, to be delivered no later than July 8, 2026.
6. A copy of the June 9 Endorsement was appended as Appendix "A" to the Supplementary Second Report.

The Purpose of the Second Supplementary Second Report

7. The purpose of this Second Supplementary Second Report is to update the Court on material procedural developments since the date of the Supplementary Second Report, including: (i) the delivery of written interrogatories in accordance with the June 9 Endorsement; and (ii) the status and outcome of the various examinations/cross-examinations contemplated by the June 9 Endorsement.

II. UPDATE TO THE COURT RE: WRITTEN INTERROGATORIES AND EXAMINATIONS/CROSS-EXAMINATIONS

Written Interrogatories

8. As noted above, pursuant to the June 9 Endorsement, written interrogatories in respect of the Receiver's report(s) were to be completed by no later than June 26, 2026.
9. Following the issuance of the June 9 Endorsement, RA corresponded on several occasions with counsel to the Debtors, Covenant LLP ("**Covenant**"), as well as other parties, including AAM's former counsel, Sukhvir Singh, requesting that any written interrogatories be delivered in advance of the deadline established by the Court. Copies of the relevant correspondence between RA and Covenant are attached hereto as **Appendix "A"**.
10. At approximately 10:56 p.m. (Toronto time) on June 26, 2026, delivered the Debtors' written interrogatories in respect of the Receiver.
11. As of the date of this Supplementary Second Report, the Receiver is preparing responses to the written interrogatories, which it intends to deliver to Covenant forthwith.

Examinations/Cross-Examinations

12. In accordance with the June 9 Endorsement, the Receiver, Morrison and the Debtors each exercised their respective rights to conduct examinations/cross-examinations. Notices of examination were issued as follows:
 - a. by the Receiver, to (i) Mr. Scot Morris of Colliers, the appraiser that conducted the Colliers appraisal as noted in the Responding Affidavit and discussed in the Supplementary Second Report, and (ii) Ahmed;
 - b. by the Debtors, to (i) Mr. C. Vajanopath, (ii) Mr. A. Zeldin of the Receiver's office and the affiant in respect of the Receiver's fee approval, and (iii) Mr. D. Michaud of RA's office and the affiant in respect of RA's fee approval; and
 - c. by Morrison, to Ahmed.
13. A summary of the status and outcome of each of the proposed examinations/cross-examinations is set out below.

Mr. Morris

14. Following service of the Receiver's notice of examination on the Debtors' appraiser, counsel to the Receiver took the necessary steps to arrange for the examination of Mr. Morris to proceed, including corresponding with counsel to the Debtors regarding scheduling and attendance.
15. Despite those efforts, the appraiser did not attend for the scheduled examination. The Receiver understands that, prior to the scheduled examination, Covenant instructed Mr. Morris not to attend.
16. Representatives of the Receiver, together with counsel to the Receiver (RA) and counsel to Morrison, Garfinkle Biderman LLP ("**GB**"), attended at the scheduled examination. Mr. Morris did not attend, and a Certificate of Non-Attendance was obtained. A copy of the Certificate of Non-Attendance is attached hereto as **Appendix "B"**.
17. Copies of the relevant correspondence between RA, Covenant and Mr. Morris concerning the scheduling of, and attendance at, Mr. Morris' examination are attached hereto as **Appendix "C"**.

Mr. Vajanopath

18. On June 24, 2026, Covenant served a notice of examination requiring Mr. Vajanopath to attend for cross-examination. The cross-examination proceeded on the morning of June 25, 2026.
19. As discussed further below, the Debtors subsequently requested that Mr. Vajanopath re-attend for further examination in relation to matters arising from the initial cross-examination, which request was ultimately refused.

Ahmed, Mr. Zeldin and Mr. Michaud

20. As noted above, the Receiver and Morrison each served notices of examination requiring Ahmed to attend for cross-examination. The Debtors, in turn, served notices of examination requiring Mr. A. Zeldin of the Receiver's office and Mr. D. Michaud of RA to attend for cross-examination on their respective affidavits filed in support of the Receiver's professional fee approval, which were appended to the Second Report.
21. Following discussions and correspondence among RA, GB, Covenant and Ahmed, both before and after the cross-examination of Mr. Vajanopath, the parties agreed that the proposed cross-examinations of Ahmed, Mr. Zeldin and Mr. Michaud would not proceed. It was further agreed that, in lieu of cross-examining Mr. Zeldin and Mr. Michaud, any questions relating to their respective fee affidavits would be addressed through written interrogatories.
22. Notwithstanding that agreement, during the evening of June 25, 2026, the Debtors served further notices of examination requiring Mr. Zeldin and Mr. Michaud to attend for cross-examination. The Debtors also served a further notice of examination on Mr. Vajanopath in respect of additional matters arising from his earlier cross-examination.
23. On June 26, 2026, each of RA and GB responded to the June 25 examination notices advising, among other things, that the parties would not be attending the proposed examinations. Copies of the correspondence in connection with the foregoing are attached hereto as **Appendix "D"**.

All of which is respectfully submitted this 30th day of June 2026

Albert Gelman Inc.

**ALBERT GELMAN INC.,
solely in its capacity as
Receiver and Manager of
AG (1000 & 1024 Dundas St. E.), AG (1000 & 1024 Dundas St. E.) LP
and AG (1000 & 1024 Dundas St. E.) Inc.
and not in its personal or any other capacity**

APPENDIX “A”

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 22, 2026 10:36 AM
To: Shahzad Siddiqui
Cc: info@sslawpc.ca; Covenant LLP; Osman Ali; Anisha Samat; Bryan Gelman; bsachdeva@millerthomson.com; dtang@millerthomson.com; Kevin.Ohara@ontario.ca; Wendy Greenspoon; jennifer.okeefe-rahman@cra-arc.gc.ca; Adam Zeldin
Subject: RE: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

Shahzad:

Can we please hear from you on this matter this today? We need to confirm times for examinations so we do not miss the deadlines in the Endorsement of Justice Dietrich.

We also need to have your written questions for the Receiver by the end of the day so we can complete these written answers this week.

Dom

Dominique Michaud
Partner

**ROBINS
APPLEBY^{LLP}**

E: dmichaud@robapp.com

T: 416.360.3795

W: www.robapp.com



From: Wendy Greenspoon <wgreenspoon@GARFINKLE.com>

Sent: June 19, 2026 5:12 PM

To: Dominique Michaud <dmichaud@robapp.com>

Cc: Shahzad Siddiqui <shahzad@covenantllp.ca>; info@sslawpc.ca; Covenant LLP <info@covenantllp.ca>; Osman Ali <osman@covenantllp.ca>; Anisha Samat <asamat@robapp.com>; bgelman@albertgelman.com; bsachdeva@millerthomson.com; dtang@millerthomson.com; Kevin.Ohara@ontario.ca; jennifer.okeefe-rahman@cra-arc.gc.ca; Adam Zeldin <azeldin@albertgelman.com>

Subject: Re: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

CAUTION: External e-mail.

Shahzad,

Could you also please advise me as soon as possible whether or not you intend to conduct any cross-examination of my client.

Wendy

Wendy H. Greenspoon-Soer
Partner
Garfinkle, Biderman LLP
Suite 801
1 Adelaide Street East
Toronto, Ontario M5C 2V9
Tel No: 416.869.1234
DIRECT LINE: 416.869.7615
Fax No: 416.869.0547
E-mail: wgreenspoon@garfinkle.com
www.garfinkle.com

On Jun 19, 2026, at 5:02 PM, Dominique Michaud <dmichaud@robapp.com> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Further to my discussion with Shahzad yesterday, please confirm that Mr. Ahmed and Mr. Morris will appear to be examined on June 25th.

If your client is maintaining its objection to cross-examinations, please confirm that you have made the necessary arrangements to attend at a case conference with Justice Dietrich to seek directions from the court on this issue and the other issues raised on our phone call.

I look forward to hearing from you.

Dom

Dominique Michaud
Partner

E: dmichaud@robapp.com
T: 416.360.3795

From: Dominique Michaud <dmichaud@robapp.com>

Sent: June 18, 2026 11:23 AM

To: Shahzad Siddiqui <shahzad@covenantllp.ca>; info@sslawpc.ca

Cc: Covenant LLP <info@covenantllp.ca>; Osman Ali <osman@covenantllp.ca>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; bgelman@albertgelman.com; bsachdeva@millertomson.com; dtang@millertomson.com; Kevin.Ohara@ontario.ca; jennifer.okeefe-rahman@cra-arc.gc.ca; Adam Zeldin <azeldin@albertgelman.com>

Subject: RE: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

Gentlemen:

I am following up on this. Can you please respond asap and/or please call me at the office to discuss. This needs to be dealt with now so you do not compromise the timetable set out in Justice Dietrich's Endorsement.

Dom

Dominique Michaud
Partner

From: Dominique Michaud <dmichaud@robapp.com>

Sent: June 17, 2026 5:20 PM

To: Shahzad Siddiqui <shahzad@covenantllp.ca>; info@sslawpc.ca

Cc: Covenant LLP <info@covenantllp.ca>; Osman Ali <osman@covenantllp.ca>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; bgelman@albertgelman.com; bsachdeva@millertomson.com; dtang@millertomson.com; Kevin.Ohara@ontario.ca; jennifer.okeefe-rahman@cra-arc.gc.ca; Adam Zeldin <azeldin@albertgelman.com>

Subject: RE: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

Gentlemen:

In furtherance to the Endorsement of Justice Dietrich (attached), we are to complete cross-examinations and answer written interrogatories by June 26, 2026. In anticipation of this timetable we require the questions for the Receiver by Monday at 12:00 noon so we can respond appropriately and meet the tight timetable for written answers.

In terms of cross-examinations we will need to set aside one of either Wednesday June 24th and Thursday June 25th so the Receiver can examine Mr. Ahmed on his affidavit.

As the Respondents also appear to be relying on the evidence/ report of Scot Morris, we will also need to examine him on one of these two days and require you to make the necessary arrangements for Mr. Morris to attend to be examined.

Please confirm the availability of Mr. Ahmed and Mr. Morris for tomorrow and we will make the necessary arrangements and deliver the Notices of Examination. If possible, I suggest a quick call to go over the logistics of how this will move forward sometime this evening or tomorrow.

Dom

Dominique Michaud
Partner

**ROBINS
APPLEBY^{LLP}**

E: dmichaud@robapp.com

T: 416.360.3795

W: www.robapp.com



From: Dominique Michaud <dmichaud@robapp.com>

Sent: June 15, 2026 12:36 PM

To: Shahzad Siddiqui <shahzad@covenantllp.ca>

Cc: Covenant LLP <info@covenantllp.ca>; Osman Ali <osman@covenantllp.ca>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; bgelman@albertgelman.com; bsachdeva@millerthomson.com; dtang@millerthomson.com; Kevin.Ohara@ontario.ca; jennifer.okeefe-rahman@cra-arc.gc.ca

Subject: RE: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

Shahzad:

Your affidavit refers to a Colliers Appraisal Report but it is not included as an Exhibit. Can you please send us a copy of this Report so we can review and respond if necessary.

Thank you.

Dom

Dominique Michaud
Partner

**ROBINS
APPLEBY^{LLP}**

E: dmichaud@robapp.com

T: 416.360.3795

W: www.robapp.com



From: Osman Ali <osman@covenantllp.ca>

Sent: June 12, 2026 8:10 PM

To: wgreenspoon@garfinkle.com; Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>; bgelman@albertgelman.com; bsachdeva@millerthomson.com; dtang@millerthomson.com; Kevin.Ohara@ontario.ca; jennifer.okeefe-rahman@cra-arc.gc.ca

Cc: Shahzad Siddiqui <shahzad@covenantllp.ca>; Covenant LLP <info@covenantllp.ca>

Subject: Morrison Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al. - CV-25-00747127-00CL

CAUTION: External e-mail.

Hello,

Please find enclosed the Responding Affidavit of Mohammed Ahmed in the above-noted matter.

Regards,

--

<image001.jpg>

Osman Ali
Covenant LLP
180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6
Email: osman@covenantllp.ca
Tel: 416-449-5050
covenantllp.ca

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Robins Appleby LLP | 2600-120 Adelaide St.W., Toronto, ON M5H
1T1 | <https://www.robinsappleby.com/>

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..--

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 23, 2026 12:49 PM
To: Shahzad Siddiqui
Cc: wgreenspoon@garfinkle.com; Wendy Lee; Anisha Samat; Bryan Gelman; Adam Zeldin
Subject: RE: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

Importance: High

Shahzad:

Thanks for your note. Given the extensive discussion at paras. 51-67 Mr. Ahmed's affidavit that relies on the Colliers Report and Mr. Morris' opinion, we still intend to examine Mr. Morris on Thursday and require his attendance on Thursday morning. Please confirm that you are arranging Mr. Morris to be in attendance for this examination. We are also sending a copy to Morris directly by email.

If you have now withdrawn the above paragraphs and are no longer relying on the argument that Colliers opinion as to value is the preferred valuation please let us know.

Also, please confirm when we will receive your clients' written questions for the Receiver. We require these questions asap in order to respond by end of day Friday.

I look forward to hearing from you soon.

Dom

Dominique Michaud
Partner

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W: www.robapp.com



From: Shahzad Siddiqui <shahzad@covenantllp.ca>
Sent: June 23, 2026 12:09 PM
To: Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>
Cc: wgreenspoon@garfinkle.com; Wendy Lee <wlee@robapp.com>
Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 24, 2026 8:02 AM
To: Shahzad Siddiqui
Cc: Morris, Scot; wgreenspoon@garfinkle.com; Anisha Samat; Wendy Lee; Bryan Gelman; Adam Zeldin; Sukhvir Singh
Subject: RE: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.
Attachments: 2026-06-09-Endorsement of Justice J. Dietrich.pdf

Shahzad:

As requested:

1. The Receiver is conducting a examination pursuant to Rule 39.03.
2. The Receiver is seeking to examine Mr. Morris as a result of the specific issues raised in Mr. Ahmed's affidavit. There is nothing improper about this step. Further the endorsement of Justice Dietrich (attached) does not prohibit this type of examination which is permitted by the *Rules of Civil Procedure*.
3. Mr. Morris was served with the Notice of Examination and has been consulted directly in respect of his availability today at 1:00 pm to accommodate his travel schedule tomorrow. We have since delivered updated examination details to him and expect him to attend to answer our questions. We do not expect the examination to take much more than 30 minutes.

Respectfully it appears as though you are attempting to put up roadblocks to delay and prevent the Receiver from responding to your clients' position on the pending motion. To that end, I remind you that this hearing is being heard on the Commercial List and all counsel should follow the "three Cs" of the Commercial List being cooperation, communication, and common sense. As you know, these principles guide all interactions on the Commercial List and counsel are expected to cooperate with one another, communicate effectively about scheduling and procedural matters, and apply common sense to resolve issues without unnecessary court intervention.

To deal with your concern, I believe a practical resolution would be for us to complete the Rule 39 examination of Mr. Morris today on the condition that it is without prejudice to your ability to argue the examination was not permitted and the evidence should not be considered at the hearing. This way we are able to adhere to the timetable and we can let the Judge at the hearing decide if the Rule 39 examination was appropriate. Please confirm if this arrangement is acceptable to you.

Lastly, the Receiver was requested the delivery of your clients' written questions several times in order to meet the timetable. Please deliver these questions this morning along with any Notice of Examinations you intend to deliver.

If you wish to discuss, please call me. I believe with an honest phone conversation we should be able to resolve these issues.

Dom

Dominique Michaud
Partner

**ROBINS
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E: dmichaud@robapp.com

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W: www.robapp.com



From: Shahzad Siddiqui <shahzad@covenantllp.ca>

Sent: June 23, 2026 7:10 PM

To: Dominique Michaud <dmichaud@robapp.com>

Cc: Morris, Scot <scot.morris@colliers.com>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; Wendy Lee <wlee@robapp.com>; Bryan Gelman <bgelman@albertgelman.com>; Adam Zeldin <azeldin@albertgelman.com>; Sukhvir Singh <info@sslawpc.ca>

Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

Can you address my points below in serial order? Also, we will be serving Notices of Examination on all 3 affiants for Thursday.



Shahzad Siddiqui

Covenant LLP

180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6

Email: shahzad@covenantllp.ca

Tel: (416) 449-5050

covenantllp.ca

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On Tue, Jun 23, 2026, 6:23 p.m. Dominique Michaud <dmichaud@robapp.com> wrote:

As discussed, the Receiver disagrees with you. We will proceed with our examination of Mr. Morris tomorrow at 1:00 pm as previously advised. Mr. Morris has already confirmed his availability with me for this time. If Mr. Morris does not attend, we will obtain a certificate of non-attendance and bring this to the court's attention.

APPENDIX “B”

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

B E T W E E N:

MORRISON FINANCIAL MORTGAGE CORPORATION

Applicantf

- and -

AG (1000 & 1024 DUNDAS ST. E.) GPINC., AG (1000 & 1024
DUNDAS ST. E.) LP and AG (1000 & 1024 DUNDAS ST. E..) INC.

Respondents

APPLICATION UNDER SUBSECTION 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

Certificate of Non-Attendance

I, Robyn Arndt, Examiner, hereby certify:

That an appointment was issued for the 24th day of June, 2026, at my office, Victory Verbatim Reporting Services, Suite 900, 222 Bay Street, Toronto, Ontario, at the hour of 1:00 p.m. for the Examination pursuant to Rule 39.03 of the Rules of Civil Procedure,, via video conference, of SCOT MORRIS.

That at the said last above-mentioned time and place, I was attended by DOMINIQUE MICHAUD, from the offices of ROBINS APPLEBY LLP, appearing as lawyers for the Court-Appointed Receiver, ALBERT GELMAN INC. AND WENDY GREENSPON-SOER, lawyers for the Applicant, who waited more than fifteen (15) minutes, but the said SCOT MORRIS did not appear, nor did anyone on their behalf.

Dated at Toronto this 24th day of June, 2026.



Robyn Arndt
Examiner



APPENDIX “C”

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 23, 2026 4:00 PM
To: Shahzad Siddiqui
Cc: wgreenspoon@garfinkle.com; Wendy Lee; Anisha Samat; Bryan Gelman; Adam Zeldin
Subject: RE: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

Shahzad:

I have been trying to reach you over the last 2 days and you have not returned my phone calls.

We understand that Mr. Morris is available at 1:00 pm tomorrow for his examination and not available on Thursday as he is away in Japan on vacation. In the circumstances, we are rescheduling Mr. Morris for 1:00 pm tomorrow to comply with the timetable. We will agree to cancel Mr. Morris' examination only if your clients agree to withdraw paras. 51-67 Mr. Ahmed's affidavit and withdraw any argument that relies on the Colliers Report and Mr. Morris' opinion on a with prejudice basis.

Please confirm how we will proceed this afternoon.

Dom

Dominique Michaud
Partner

**ROBINS
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E: dmichaud@robapp.com

T: 416.360.3795

W: www.robapp.com



From: Dominique Michaud <dmichaud@robapp.com>

Sent: June 23, 2026 12:49 PM

To: 'Shahzad Siddiqui' <shahzad@covenantllp.ca>

Cc: wgreenspoon@garfinkle.com; Wendy Lee <wlee@robapp.com>; Anisha Samat <asamat@robapp.com>; Bryan Gelman <bgelman@albertgelman.com>; Adam Zeldin <azeldin@albertgelman.com>

Subject: RE: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

Importance: High

Shahzad:

Thanks for your note. Given the extensive discussion at paras. 51-67 Mr. Ahmed's affidavit that relies on the Colliers Report and Mr. Morris' opinion, we still intend to examine Mr. Morris on Thursday and require his attendance on Thursday morning. Please confirm that you are arranging Mr. Morris to be in attendance for this examination. We are also sending a copy to Morris directly by email.

If you have now withdrawn the above paragraphs and are no longer relying on the argument that Colliers opinion as to value is the preferred valuation please let us know.

Also, please confirm when we will receive your clients' written questions for the Receiver. We require these questions asap in order to respond by end of day Friday.

I look forward to hearing from you soon.

Dom

From: Shahzad Siddiqui <shahzad@covenantllp.ca>

Sent: June 23, 2026 12:09 PM

To: Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>

Cc: wgreenspoon@garfinkle.com; Wendy Lee <wlee@robapp.com>

Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

We have not put forward an affidavit from Scot Morris and will not be relying upon him on this motion.

Yours truly,



Shahzad Siddiqui
Covenant LLP

180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6
Email: shahzad@covenantllp.ca
Tel: (416) 449-5050
covenantllp.ca

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On Tue, Jun 23, 2026 at 10:52 AM Wendy Lee <wlee@robapp.com> wrote:

Dear Mr. Siddiqui,

Enclosed please find the Notice of Examination of Scot Morris for his examination scheduled on Thursday, June 25, 2026 at 10:00 a.m. for the above-noted matter, served upon you pursuant to the *Rules of Civil Procedure*.

If you do not receive all pages, please contact Wendy Lee at (416) 868-1080. Our office address is 120 Adelaide Street West, Suite 2600, Toronto, Ontario M5H 1T1.

Thank you.

Wendy Lee
Legal Assistant to Irving Marks and Dominique Michaud

**ROBINS
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E: wlee@robapp.com

T: 416.868.1080

W: www.robapp.com



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...-

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 24, 2026 8:02 AM
To: Shahzad Siddiqui
Cc: Morris, Scot; wgreenspoon@garfinkle.com; Anisha Samat; Wendy Lee; Bryan Gelman; Adam Zeldin; Sukhvir Singh
Subject: RE: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.
Attachments: 2026-06-09-Endorsement of Justice J. Dietrich.pdf

Shahzad:

As requested:

1. The Receiver is conducting a examination pursuant to Rule 39.03.
2. The Receiver is seeking to examine Mr. Morris as a result of the specific issues raised in Mr. Ahmed's affidavit. There is nothing improper about this step. Further the endorsement of Justice Dietrich (attached) does not prohibit this type of examination which is permitted by the *Rules of Civil Procedure*.
3. Mr. Morris was served with the Notice of Examination and has been consulted directly in respect of his availability today at 1:00 pm to accommodate his travel schedule tomorrow. We have since delivered updated examination details to him and expect him to attend to answer our questions. We do not expect the examination to take much more than 30 minutes.

Respectfully it appears as though you are attempting to put up roadblocks to delay and prevent the Receiver from responding to your clients' position on the pending motion. To that end, I remind you that this hearing is being heard on the Commercial List and all counsel should follow the "three Cs" of the Commercial List being cooperation, communication, and common sense. As you know, these principles guide all interactions on the Commercial List and counsel are expected to cooperate with one another, communicate effectively about scheduling and procedural matters, and apply common sense to resolve issues without unnecessary court intervention.

To deal with your concern, I believe a practical resolution would be for us to complete the Rule 39 examination of Mr. Morris today on the condition that it is without prejudice to your ability to argue the examination was not permitted and the evidence should not be considered at the hearing. This way we are able to adhere to the timetable and we can let the Judge at the hearing decide if the Rule 39 examination was appropriate. Please confirm if this arrangement is acceptable to you.

Lastly, the Receiver was requested the delivery of your clients' written questions several times in order to meet the timetable. Please deliver these questions this morning along with any Notice of Examinations you intend to deliver.

If you wish to discuss, please call me. I believe with an honest phone conversation we should be able to resolve these issues.

Dom

Dominique Michaud
Partner

**ROBINS
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T: 416.360.3795

W: www.robapp.com



From: Shahzad Siddiqui <shahzad@covenantllp.ca>

Sent: June 23, 2026 7:10 PM

To: Dominique Michaud <dmichaud@robapp.com>

Cc: Morris, Scot <scot.morris@colliers.com>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; Wendy Lee <wlee@robapp.com>; Bryan Gelman <bgelman@albertgelman.com>; Adam Zeldin <azeldin@albertgelman.com>; Sukhvir Singh <info@sslawpc.ca>

Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

Can you address my points below in serial order? Also, we will be serving Notices of Examination on all 3 affiants for Thursday.



Shahzad Siddiqui

Covenant LLP

180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6

Email: shahzad@covenantllp.ca

Tel: (416) 449-5050

covenantllp.ca

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On Tue, Jun 23, 2026, 6:23 p.m. Dominique Michaud <dmichaud@robapp.com> wrote:

As discussed, the Receiver disagrees with you. We will proceed with our examination of Mr. Morris tomorrow at 1:00 pm as previously advised. Mr. Morris has already confirmed his availability with me for this time. If Mr. Morris does not attend, we will obtain a certificate of non-attendance and bring this to the court's attention.

We look forward to completing the examination of Morris tomorrow.

Thank you.

Dom

Dominique Michaud
Partner

**ROBINS
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T: 416.360.3795

W: www.robapp.com



From: Shahzad Siddiqui <shahzad@covenantllp.ca>

Sent: June 23, 2026 5:59 PM

To: Dominique Michaud <dmichaud@robapp.com>

Cc: Morris, Scot <scot.morris@colliers.com>; wgreenspoon@garfinkle.com; Anisha Samat <asamat@robapp.com>; Wendy Lee <wlee@robapp.com>; Bryan Gelman <bgelman@albertgelman.com>; Adam Zeldin <azeldin@albertgelman.com>; Sukhvir Singh <info@sslawpc.ca>

Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

Counsel,

We write in response to the Notice of Examination today purporting to compel the attendance of Scot Morris on June 25, 2026 for an examination under Rule 39.03.

We raise the following issues with your Notice.

1. Mr. Morris has not sworn an affidavit on this motion. He is the author of an appraisal report appended as Confidential Appendix 1 to the Responding Affidavit of Mohammed Ahmed sworn March 26, 2026, and the source of correspondence appended as Exhibit "K" to the Responding Affidavit of Mohammed Ahmed sworn June 12, 2026. He is not an affiant. He is not subject to cross-examination under Rule 39.02.

2. The Notice expressly invokes Rule 39.03. Paragraph 5(c) of the endorsement of Justice Dietrich dated June 9, 2026 establishes the exclusive procedural mechanics for testing evidence on this motion: written interrogatories on the Receiver's reports, and cross-examination on affidavit evidence. Rule 39.03 examination of non-party witnesses is not authorized by the endorsement. The Receiver has not sought leave to depart from it.

3. Independently, the Notice does not satisfy Rule 39.03. No Summons to Witness in Form 53A under Rule 53.04 has been issued or served personally upon Mr. Morris. No conduct money under Tariff A has been tendered. Service was effected upon counsel for another party rather than upon the witness, who has independent counsel at Colliers.

Yours truly,



Shahzad Siddiqui

Covenant LLP

[180 Duncan Mill Road,](#)

[Toronto, Ontario, M3B 1Z6](#)

Email: shahzad@covenantllp.ca

Tel: (416) 449-5050

covenantllp.ca

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On Tue, Jun 23, 2026 at 4:13 PM Dominique Michaud <dmichaud@robapp.com> wrote:

Mr. Morris:

Thank you for speaking with me . To accommodate your travel schedule, we can move your virtual examination to 1:00 pm tomorrow. We have communicated with Mr. Siddiqui and advised on the terms where we would agree to cancel the examination and are awaiting his response. That said, until we have an agreement on this issue, please prepare to attend tomorrow at 1:00 pm tomorrow. We do not expect to be more than 1 hour.

My assistant Wendy Lee will send out a calendar invitation with the virtual examination details shortly. In this email, Wendy will also send you a link to the various affidavits and reports that were filed for our motion.

Please let me know if you have any questions.

Dom

Dominique Michaud
Partner

**ROBINS
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E: dmichaud@robapp.com

T: 416.360.3795

W: www.robapp.com



From: Morris, Scot <scot.morris@colliers.com>

Sent: June 23, 2026 1:15 PM

To: Wendy Lee <wlee@robapp.com>

Cc: Shahzad Siddiqui <shahzad@covenantllp.ca>; wgreenspoon@garfinkle.com; Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>

Subject: Re: Morris Financial Mortgage Corporation v. AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

Hi Wendy, I just left you a voicemail. Please call me back when you have a moment.

This is the first I'm hearing of this scheduled examination. I'm leaving on vacation Wednesday morning and will be gone for 3 weeks. Am I able to schedule it for when I return?

Regards

Scot Morris B.Comm, AACI, [P.App](#)
Executive Director
Mobile [+1 416 356 6220](#) | [View my profile](#)
scot.morris@colliers.com

On Jun 23, 2026, at 12:54 PM, Wendy Lee <wlee@robapp.com> wrote:

Dear Mr. Morris,

Enclosed please find the Notice of Examination for your examination scheduled on Thursday, June 25, 2026 at 10:00 a.m. for the above-noted matter. Please note that a copy of the attached Notice of Examination was served on Mr. Siddiqui earlier this morning.

If you do not receive all pages, please contact Wendy Lee at (416) 868-1080. Our office address is [120 Adelaide Street West, Suite 2600, Toronto, Ontario M5H 1T1](#).

Thank you.

Wendy Lee
Legal Assistant to Irving Marks and Dominique Michaud



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..--

<Notice of Examination of Scot Morris - Receiver - Albert Gelman Inc. - 23-JUN-2026.pdf>

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..-

APPENDIX “D”

Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 25, 2026 4:58 PM
To: Shahzad Siddiqui
Cc: osman@covenantllp.ca; Covenant LLP; Adam Zeldin; Anisha Samat; wgreenspoon@garfinkle.com
Subject: RE:

You made a decision to send Mr. Zeldin home and to proceed with written questions for the Receiver and the Receiver's counsel as it relates to fees and activities. As part of this agreement, we also agreed to forego a cross-examination of Mr. Ahmed. It should be noted that we attended examinations from 11 am until 4 pm where Mr. Zeldin and I were available for cross-examination and you did not move forward. Further, as I previously advised I am not free tomorrow nor is my client and we will not be reattending in these circumstances.

Please deliver your written questions, including questions on fees, as soon as possible and we will do our best to answer them promptly.

If you wish to address this issue in advance of the motion, please schedule a case conference with Justice Dietrich. I am available for a case conference on Monday or Tuesday.

Dom

Dominique Michaud
Partner

**ROBINS
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T: 416.360.3795

W: www.robapp.com



From: Shahzad Siddiqui <shahzad@covenantllp.ca>
Sent: June 25, 2026 4:44 PM
To: Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>; wgreenspoon@garfinkle.com
Cc: osman@covenantllp.ca; Covenant LLP <info@covenantllp.ca>
Subject:

CAUTION: External e-mail.

Counsel,

Justice Dietrich's order gives us till tomorrow for cross-examinations on affidavits, including on the fees and disbursements. Mr. Vajanopath's examination was not completed today. There was no agreement on the Receiver or Receiver's counsel.

I have instructions to serve Notices of Examination at Victory Verbatim for 3 p.m tomorrow in compliance with the Order, as it is the only day remaining and we could not agree otherwise.

Yours truly,



Shahzad Siddiqui
Covenant LLP

180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6
Email: shahzad@covenantllp.ca
Tel: (416) 449-5050
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Adam Zeldin

From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 25, 2026 5:29 PM
To: Osman Ali; Anisha Samat
Cc: Shahzad Siddiqui; Covenant LLP; wgreenspoon@garfinkle.com; Adam Zeldin; Bryan Gelman
Subject: RE: Morrison Financial v AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

Please see our email from 4:58 pm. We are not attending tomorrow as we explained. Please deliver your written questions for the Receiver.

Dom

Dominique Michaud
Partner

**ROBINS
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E: dmichaud@robapp.com
T: 416.360.3795
W: www.robapp.com



From: Osman Ali <osman@covenantllp.ca>
Sent: June 25, 2026 5:24 PM
To: wgreenspoon@garfinkle.com; Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>; azeldin@albertgelman.com; bgelman@albertgelman.com
Cc: Shahzad Siddiqui <shahzad@covenantllp.ca>; Covenant LLP <info@covenantllp.ca>
Subject: Morrison Financial v AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

CAUTION: External e-mail.

Hello,

Please see the enclosed Notices of Examination in the above-noted matter.

For Mr. Vajanopath, it will be a continuation of his examination from today.

Regards,

--



Osman Ali
Covenant LLP
180 Duncan Mill Road,
Toronto, Ontario, M3B 1Z6
Email: osman@covenantllp.ca
Tel: 416-449-5050
covenantllp.ca

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Adam Zeldin

From: Wendy Greenspoon <wgreenspoon@GARFINKLE.com>
Sent: June 25, 2026 5:01 PM
To: Dominique Michaud; Shahzad Siddiqui
Cc: osman@covenantllp.ca; Covenant LLP; Adam Zeldin; Anisha Samat
Subject: RE:

Mr. Vajanopath's examination was completed today. I will not be producing him tomorrow. Feel free to order the transcript and make whatever arguments you wish



Wendy H. Greenspoon-Soer
Partner
Garfinkle, Biderman LLP
Suite 801
1 Adelaide Street East
Toronto, Ontario M5C 2V9
Tel No: 416.869.1234
DIRECT LINE: 416.869.7615
Fax No: 416.869.0547
E-mail: wgreenspoon@garfinkle.com
www.garfinkle.com

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From: Dominique Michaud <dmichaud@robapp.com>
Sent: June 25, 2026 4:58 PM
To: Shahzad Siddiqui <shahzad@covenantllp.ca>
Cc: osman@covenantllp.ca; Covenant LLP <info@covenantllp.ca>; Adam Zeldin <azeldin@albertgelman.com>; Anisha Samat <asamat@robapp.com>; Wendy Greenspoon <wgreenspoon@GARFINKLE.com>
Subject: RE:

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You made a decision to send Mr. Zeldin home and to proceed with written questions for the Receiver and the Receiver's counsel as it relates to fees and activities. As part of this agreement, we also agreed to forego a cross-examination of Mr. Ahmed. It should be noted that we attended examinations from 11 am until 4 pm where Mr. Zeldin and I were available for cross-examination and you did not move forward.

Further, as I previously advised I am not free tomorrow nor is my client and we will not be reattending in these circumstances.

Please deliver your written questions, including questions on fees, as soon as possible and we will do our best to answer them promptly.

If you wish to address this issue in advance of the motion, please schedule a case conference with Justice Dietrich. I am available for a case conference on Monday or Tuesday.

Dom

Dominique Michaud
Partner

 **E:** dmichaud@robapp.com
T: 416.360.3795
W: www.robapp.com


From: Shahzad Siddiqui <shahzad@covenantllp.ca>

Sent: June 25, 2026 4:44 PM

To: Dominique Michaud <dmichaud@robapp.com>; Anisha Samat <asamat@robapp.com>;
wgreenspoon@garfinkle.com

Cc: osman@covenantllp.ca; Covenant LLP <info@covenantllp.ca>

Subject:

CAUTION: External e-mail.

Counsel,

Justice Dietrich's order gives us till tomorrow for cross-examinations on affidavits, including on the fees and disbursements. Mr. Vajanopath's examination was not completed today. There was no agreement on the Receiver or Receiver's counsel.

I have instructions to serve Notices of Examination at Victory Verbatim for 3 p.m tomorrow in compliance with the Order, as it is the only day remaining and we could not agree otherwise.

Yours truly,



Shahzad Siddiqui

Covenant LLP

180 Duncan Mill Road,

Toronto, Ontario, M3B 1Z6

Email: shahzad@covenantllp.ca

Tel: (416) 449-5050

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Adam Zeldin

From: Wendy Greenspoon <wgreenspoon@GARFINKLE.com>
Sent: June 25, 2026 5:36 PM
To: Osman Ali; Dominique Michaud; asamat@robapp.com; Adam Zeldin; Bryan Gelman
Cc: Shahzad Siddiqui; Covenant LLP
Subject: RE: Morrison Financial v AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

As I advised Mr. Siddiqui, Mr. Vajanopath's examination was completed and he will not be attending tomorrow



Wendy H. Greenspoon-Soer
Partner
Garfinkle, Biderman LLP
Suite 801
1 Adelaide Street East
Toronto, Ontario M5C 2V9
Tel No: 416.869.1234
DIRECT LINE: 416.869.7615
Fax No: 416.869.0547
E-mail: wgreenspoon@garfinkle.com
www.garfinkle.com

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From: Osman Ali <osman@covenantllp.ca>
Sent: June 25, 2026 5:24 PM
To: Wendy Greenspoon <wgreenspoon@GARFINKLE.com>; Dominique Michaud <dmichaud@robapp.com>; asamat@robapp.com; azeldin@albertgelman.com; bgelman@albertgelman.com
Cc: Shahzad Siddiqui <shahzad@covenantllp.ca>; Covenant LLP <info@covenantllp.ca>
Subject: Morrison Financial v AG (1000 & 1024 Dundas St. E.) GP Inc. et al.

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Hello,

Please see the enclosed Notices of Examination in the above-noted matter.

For Mr. Vajanopath, it will be a continuation of his examination from today.

Regards,

--



Osman Ali
Covenant LLP
180 Duncan Mill Road,
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