

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE TORONTO-DOMINION BANK

Applicant

-and-

DIAMOND INTERNATIONAL REALTY INC., DIAMOND LUXURY DEVELOPMENTS CORP.,
and IMRAN ALI AHMED

Respondents

SUPPLEMENTAL RECORD

(Returnable Friday, April 24, 2026)

April 23, 2026

HARRISON PENSA LLP

Barristers & Solicitors
130 Dufferin Avenue, Suite 1101
London, ON N6A 5R2

Timothy C. Hogan (LSO#36553S)
Thomas Masterson (LSO#76835U)

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

Lawyers for the Applicant,
The Toronto-Dominion Bank

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Tab 1

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AFFIDAVIT OF SYDNEY INGHELBRECHT

I, **SYDNEY INGHELBRECHT**, of the City of London, in the Province of Ontario, MAKE
OATH AND SAY AS FOLLOWS:

1. I am a Law Clerk at Harrison Pensa LLP, lawyers for the Applicant, The Toronto-Dominion Bank (the "**Bank**"), and as such have knowledge of the matters to which I hereinafter depose. Unless I indicate to the contrary these matters are within my own knowledge and are true. Where I have indicated that I have obtained facts from other sources, I have identified the source and I believe those facts to be true.
2. The Respondent, Imran Ali Ahmed ("**Imran**"), is an individual that resides in Mississauga, Ontario. Imran is a director of the Respondents, Diamond International Realty Inc. and Diamond Luxury Developments Corp., and Imran is a guarantor of their obligations to the Bank.
3. On April 7, 2026, I provided Imran with the copies of the Application Record, Factum and Book of Authorities of the Applicant, all dated April 7, 2026, by way of email to imran@diamondluxury.ca. Attached hereto and marked as **Exhibit "A"** is a true copy of the email correspondence dated April 7, 2026.
4. On April 17, 2026, I sent an email to Imran to inform him, among other things, the

application had been adjourned to April 24, 2026, and I requested that he contact counsel for the Bank to discuss. Attached hereto and marked as **Exhibit "B"** is a true copy of the email correspondence dated April 17, 2026.

5. I make this Affidavit in support of the Order sought pursuant to the within application and for no other or improper purpose.

Sworn or Affirmed before me: (select one): ☒ in person OR ☐ by video conference

by Sydney Inghelbrecht at the City of London in the County of Middlesex, before me on April 23, 2026, in accordance with [O. Reg. 431/20](#).



Signature of Commissioner (or as may be)



SYDNEY INGHELBRECHT

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ATTACHED ARE EXHIBITS "A" TO "B"
REFERRED TO IN THE
AFFIDAVIT OF SYDNEY INGHELBRECHT
SWORN BEFORE ME
THIS 23rd DAY OF APRIL, 2026



A Commissioner, etc.

Exhibit “A”

From: Sydney Inghelbrecht
Sent: Tuesday, April 7, 2026 2:44 PM
To: 'imran@diamondluxury.ca'; Bryan Gelman; AGC-PGC.Toronto-Tax-Fiscal; Unit, Insolvency (MOF)
Cc: Tim Hogan; Thomas Masterson
Subject: The Toronto-Dominion Bank v. Diamond International Realty Inc., et al. (CV-26-00000762-0000) [IMAN-HPMAIN.FID1172828]
Attachments: Application Record - Applicant - The Toronto-Dominion Bank - 7-APR-2026.pdf; Book of Authorities - Applicant - The Toronto-Dominion Bank - 7-APR-2026.pdf; Factum - Applicant - The Toronto-Dominion Bank - 7-APR-2026.pdf

Good afternoon,

Please see the attached Application Record, Factum and Book of Authorities of the Applicant dated April 7, 2026, which is served upon you pursuant to the *Rules of Civil Procedure*.

Please note this matter is returnable April 17th, 2026 at 10:00a.m., in London, Ontario via Zoom.

Thank you,

Sydney Inghelbrecht | Law Clerk | HARRISON PENZA LLP | 130 Dufferin Avenue, Suite 1101, London, Ontario N6A 5R2
| *tel* 519-661-6755 | *fax* 519-667-3362 | singhelbrecht@harrisonpensa.com

This e-mail may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

Exhibit “B”

From: Sydney Inghelbrecht
Sent: Friday, April 17, 2026 2:23 PM
To: imran@diamondluxury.ca
Cc: Thomas Masterson; Tim Hogan
Subject: The Toronto-Dominion Bank v. Diamond International Realty Inc., et al. (CV-26-00000762-0000) [IMAN-HPMAIN.FID1172828]
Attachments: Application Record - Applicant - The Toronto-Dominion Bank - 7-APR-2026(11694171.1).pdf; Factum - Applicant - The Toronto-Dominion Bank - 7-APR-2026(11694172.1).pdf; Book of Authorities - Applicant - The Toronto-Dominion Bank - 7-APR-2026(11694173.1).pdf

Good afternoon,

We are counsel for the Applicant, The Toronto-Dominion Bank, in the above-noted matter.

Please note the attached materials have been served upon you personally and on Diamond International Realty Inc. and Diamond Luxury Developments Corp. by way of e-mail at this e-mail address on April 7, 2026.

On April 8, 2026, Diamond International Realty Inc. and Diamond Luxury Developments Corp were served at their respective head offices pursuant to Rule 16.03 of the Rules of Civil procedure.

Please note this matter is now returnable Friday, April 24, 2026, in London, Ontario via Zoom.

Please contact Tam Masterson at tmasterson@harrisonpensa.com or Timothy C. Hogan at thogan@harrisonpensa.com to discuss.

Thank you,

Sydney Inghelbrecht | Law Clerk | HARRISON PENSA LLP | 130 Dufferin Avenue, Suite 1101, London, Ontario N6A 5R2
| tel 519-661-6755 | fax 519-667-3362 | singhelbrecht@harrisonpensa.com

This e-mail may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

THE TORONTO-DOMINION BANK

-and-

DIAMOND INTERNATIONAL REALTY INC., et al.

Applicant

Respondents

Court File No.CV-26-00000762-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT
LONDON, ONTARIO

AFFIDAVIT

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Solicitors for the Applicant,
The Toronto-Dominion Bank

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-and-

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