

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

B E T W E E N:

VECTOR FINANCIAL SERVICES LIMITED

Applicant

- and -

33 HAWARDEN CRESCENT INC. and 35 HAWARDEN CRESCENT INC.

Respondents

**SUPPLEMENTARY RESPONDING
MOTION RECORD
(Motion to Redeem, Returnable March 15, 2024)**

March 14, 2024

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Barristers & Solicitors
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Lawyers for the Court-appointed Receiver,
Pollard & Associates Inc.

TO: **SERVICE LIST**

**ONTARIO
SUPERIOR COURT OF JUSTICE
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TAB 1

ONTARIO
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B E T W E E N:

VECTOR FINANCIAL SERVICES LIMITED

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- and -

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**SECOND SUPPLEMENTARY REPORT TO THE
FIRST REPORT OF THE COURT APPOINTED RECEIVER OF
33 HAWARDEN CRESCENT INC. and 35 HAWARDEN CRESCENT INC.**

March 14, 2024

1. This second supplementary report is being submitted to the Court by Pollard & Associates Inc., in its capacity as receiver of 33 Hawarden Crescent Inc. and 35 Hawarden Crescent Inc. pursuant to the Order of the Honourable Justice Cavanagh dated October 10, 2023 (the “**Second Supplementary Report**”).
2. The Second Supplementary Report is provided in response to the Supplementary Affidavit of Jason Allen John, sworn on March 14, 2024. As applicable, all capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the First Report of the Receiver, dated March 1, 2024.
3. Having not had previous dealings with the lenders advancing funds under the KPMAN Financing and the Doji Financing, the Receiver instructed its counsel to obtain Corporate Profile Reports for these parties. A copy of the Corporate Profile Report for KPMAN Enterprise Inc. (“**KPMAN**”), one of the lenders under the KPMAN Financing, is attached to this Supplementary Report as **Schedule “A”**.

4. The Corporate Profile Report indicates that KPMAN is pending dissolution for non-compliance with the *Canada Business Corporations Act* because it has not filed its annual returns for 2022 or 2023.

5. Having reviewed all materials filed by the Companies and the enclosed Corporate Profile Report, the Receiver continues to be concerned about the ability of the Companies to fund the proposed redemption.

All of which is respectively submitted.

Dated March 14, 2024

POLLARD & ASSOCIATES INC.,
in its capacity as the Court Appointed Receiver of
33 HAWARDEN CRESCENT INC. and 35 HAWARDEN CRESCENT INC.
and not in its personal capacity

Per:



Angela K. Pollard – President

SCHEDULE A




Government
of Canada

Gouvernement
du Canada

[Canada.ca](#) → [Innovation, Science and Economic Development Canada](#) → [Corporations Canada](#)
→ [Search for a Federal Corporation](#)

Federal Corporation Information - 851386-4

 Beware of scams and other suspicious activities. See [Corporations Canada's alerts](#).

Note

This information is available to the public in accordance with legislation (see [Public disclosure of corporate information](#)).

[Order copies of corporate documents](#)

Corporation Number

851386-4

Business Number (BN)

815747332RC0001

Corporate Name

KPMAN ENTERPRISE INC.


Status

Active - Dissolution Pending (Non-compliance)

Governing Legislation

Canada Business Corporations Act - 2013-05-06

[Order a Corporate Profile](#) [[View PDF Sample](#)] [[View HTML Sample](#)].

[Find existing extra-provincial registrations of this corporation on Canada's Business registries](#) 

Registered Office Address

161 Bay Street
Toronto ON M5J 2S1

Canada

i Note

Active CBCA corporations are required to update this information within 15 days of any change. A corporation key is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada. We will inform the corporation of its reporting obligations.

Directors

Minimum 1

Maximum 15

Seher Poor Mahmood Aghabab
47 Rockview Gardens
Vaughan ON L4K 2J4
Canada

i Note

Active CBCA corporations are required to update director information (names, addresses, etc.) within 15 days of any change. A corporation key is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada. We will inform the corporation of its reporting obligations.

Individuals with significant control

No information has been filed.

[Learn more about when this information must be filed.](#)

i Note

Active CBCA corporations are required to update this information annually (with their annual return) and within 15 days of a change in their ISC register via the Online Filing Centre. A corporation key is required. If you are not authorized to update this information, you can contact either the corporation or Corporations Canada. We will inform the corporation of its reporting obligations.

Annual Filings

Anniversary Date (MM-DD)

05-06

Date of Last Annual Meeting

2021-01-01

Annual Filing Period (MM-DD)

05-06 to 07-05

Type of Corporation

Non-distributing corporation with 50 or fewer shareholders

Status of Annual Filings

2023 - Overdue

2022 - Overdue

2021 - Filed

Corporate History

Corporate Name History

2013-05-06 to Present

KPMAN ENTERPRISE INC.

Certificates and Filings**Certificate of Incorporation**

2013-05-06

[Order copies of corporate documents](#)[Start New Search](#)[Return to Search Results](#)**Date Modified:**

2024-02-28



Profile Report

KPMAN ENTERPRISE INC. as of March 14, 2024

| | |
|--|---|
| Act | Corporations Information Act |
| Type | Extra-Provincial Federal Corporation with Share |
| Name | KPMAN ENTERPRISE INC. |
| Ontario Corporation Number (OCN) | 3083719 |
| Governing Jurisdiction | Canada - Federal |
| Incorporation/Amalgamation Date | May 06, 2013 |
| Registered or Head Office Address | Attention/Care of MR. HISHAM KUFAISHI, 1414 Indian Grove, Mississauga, Ontario, L5H 2S6, Canada |
| Status | Refer to Governing Jurisdiction |
| Date Commenced in Ontario | May 06, 2013 |
| Principal Place of Business | Attention/Care of MR. HISHAM KUFAISHI, 1414 Indian Grove, Mississauga, Ontario, L5H 2S6, Canada |

Certified a true copy of the record of the Ministry of Public and Business Service Delivery.

V. Quintanilla W.

Director/Registrar

This report sets out the most recent information filed on or after June 27, 1992 in respect of corporations and April 1, 1994 in respect of Business Names Act and Limited Partnerships Act filings and recorded in the electronic records maintained by the Ministry as of the date and time the report is generated, unless the report is generated for a previous date. If this report is generated for a previous date, the report sets out the most recent information filed and recorded in the electronic records maintained by the Ministry up to the "as of" date indicated on the report. Additional historical information may exist in paper or microfiche format.

Chief Officer or Manager

There are no chief officer or managers on file for this corporation.

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Director/Registrar

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Corporate Name History

Refer to Governing Jurisdiction

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Active Business Names

This corporation does not have any active business names registered under the Business Names Act in Ontario.

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Expired or Cancelled Business Names

This corporation does not have any expired or cancelled business names registered under the Business Names Act in Ontario.

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Document List

| Filing Name | Effective Date |
|---|----------------|
| CIA - Initial Return PAF: JONATHAN KLEIMAN - OTHER | May 09, 2013 |

All "PAF" (person authorizing filing) information is displayed exactly as recorded in the Ontario Business Registry. Where PAF is not shown against a document, the information has not been recorded in the Ontario Business Registry.

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VECTOR FINANCIAL SERVICES LIMITED

and

Court File No. CV-23-00704623-00CL
33 HAWARDEN CRESCENT INC. et al

Applicant

Respondents

**ONTARIO
SUPERIOR COURT OF JUSTICE
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Proceeding commenced at **Toronto**

SUPPLEMENTARY RESPONDING MOTION RECORD

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