

ONTARIO
SUPERIOR COURT OF JUSTICE - COMMERCIAL LIST

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF JAMES ROBERT TUCKER, RICHARD HEIS AND
ALLAN WATSON GRAHAM OF KPMG LLP, AS JOINT ADMINISTRATORS**

Applicants

**AND IN THE MATTER OF AERO INVENTORY (UK) LIMITED
and AERO INVENTORY PLC**

Respondents

**APPLICATION UNDER SECTIONS 46 AND FOLLOWING OF THE *COMPANIES'*
CREDITORS ARRANGEMENT ACT, R.S.C. 1985, C. C-36, AS AMENDED**

FACTUM
OF THE APPLICANTS
(Returnable January 21, 2010)

January 19 , 2010

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FACTUM OF THE APPLICANTS

PART I - OVERVIEW

1. By Order dated November 11, 2009, this Court recognized the appointment of the Applicants as foreign representatives of Aero Inventory (UK) Limited and Aero Inventory plc (both in administration and, collectively, the "**Foreign Debtors**"), under Part IV of the *Companies' Creditors Arrangement Act* ("**CCAA**") (the "**Recognition Order**").
2. In order to facilitate a preference action under the *Bankruptcy and Insolvency Act* ("**BIA**"), the Foreign Representatives wish to assign the Foreign Debtors into bankruptcy. They therefore bring this motion for an order to temporarily lift the stay granted in the Recognition Order and for leave to issue and serve an application for bankruptcy.

PART II - THE FACTS

3. The Foreign Debtors and their international affiliates, including Aero Inventory Canada Inc./Aero Inventaire (Canada) Inc. (“Aero Canada”), form an integrated and interdependent group of companies that supply parts to the airline industry.

Report of the Proposed Trustee dated January 19, 2010 (“Trustee Report”), para. 7, Motion Record, Tab 2, p. 13

4. The Foreign Debtors have assets in Canada, and their Canadian operations are administered by Aero Canada. They have two key Canadian customers: Air Canada and Aveos Fleet Performance Inc.

Trustee Report, para. 8, Motion Record, Tab 2, p. 13

5. The Foreign Debtors are insolvent.

Trustee Report, para. 9, Motion Record, Tab 2, p. 13

6. On November 11, 2009, administration proceedings (collectively, the “**Foreign Proceedings**”) were commenced in respect of each of the Foreign Debtors in the High Court of Justice of England and Wales (Chancery Division, Companies Court) (the “**English Court**”) and the Foreign Representatives were appointed as joint administrators of the affairs, business and property of the Foreign Debtors;

Order dated November 11, 2009, Motion Record, Tab 4

7. Also on November 11, 2009, this Honourable Court provided as follows in the Recognition Order, *inter alia*:
 - (a) recognized and enforcing the terms of the orders made on November 11, 2009 by the English Court;
 - (b) recognized the Foreign Proceedings as “foreign main proceedings” pursuant to section 47 of the CCAA;
 - (c) recognized the Foreign Representatives as “foreign representatives” as defined in section 45 of the CCAA;

- (d) stayed all proceedings in respect of the Foreign Debtors, the Foreign Representatives or their business or property, except with the written consent of the Foreign Representatives or with leave of this Court; and
- (e) appointed KPMG Inc. as Information Officer in respect of these proceedings.

Order dated November 11, 2009, Motion Record, Tab 4

- 8. On December 1, 2009, this Honourable Court made an order appointing KPMG Inc. as receiver and manager over the affairs, undertakings and properties of Aero Canada pursuant to section 49 of the *CCAA* and section 101 of the *Courts of Justice Act*.

Order dated December 1, 2009, Motion Record, Tab 5

- 9. The Foreign Representatives continue to conduct negotiations with the Foreign Debtors' key customers in Canada in an effort to resolve a number of outstanding issues arising from transactions entered into in the year prior to the Recognition Order.

Trustee Report, para. 10, Motion Record, Tab 2, p. 13

- 10. No resolution has been reached with Air Canada and both parties have agreed to present their competing concerns to the Court.

Trustee Report, para. 11, Motion Record, Tab 2, p. 13

- 11. On January 8, 2010, this Honourable Court made an order:

- (a) on the consent of Air Canada, and as it relates to Air Canada, deeming the date of the Foreign Debtors' initial bankruptcy event, if it happened after January 8, 2010, to have occurred on January 8, 2010;
- (b) scheduling a court attendance for February 1, 2010 and providing that the Foreign Representatives could attend earlier to file a bankruptcy application, if seen to be necessary.

Endorsement of Cumming J. dated January 8, 2010, Motion Record, Tab 6

- 12. The Foreign Representatives now wish to assign the Foreign Debtors into bankruptcy for the purpose of preserving the rights to pursue any reviewable transactions, settlements

and preferences or conveyances under value which may have taken place during the statutory time period prescribed by the BIA.

Trustee Report, paras. 2, 3, and 13, Motion Record, Tab 2, pp. 12-14

13. KPMG Inc. has consented to act as Trustee in Bankruptcy of the Foreign Debtors for these purposes.

Consent of the Proposed Trustee dated January 19, 2010, Motion Record, Tab 3

PART III - ISSUES TO BE DETERMINED

14. Is it appropriate for the Court to lift the stay and grant leave to the Foreign Representatives to assign the Foreign Debtors into bankruptcy?

PART IV - THE LAW

15. The CCAA provides this Honourable Court with discretion to lift the stay to permit the commencement of a proceeding under the BIA in respect of the Foreign Debtors.
16. Section 48(1)(a) provides that, where a court has recognized a foreign main proceeding, it shall make an order, subject to any terms and conditions it considers appropriate, *inter alia*,

(a) staying, until otherwise ordered by the court, for any period that the court considers necessary, all proceedings taken or that might be taken against the debtor company under the *Bankruptcy and Insolvency Act* or the *Winding-up and Restructuring Act* [...] (emphasis added)

17. As noted in the commentary thereto, “section 48(4) clarifies that the stay order pursuant to section 48(1) does not prevent anyone, including the foreign representative or foreign creditors, from requesting the commencement or continuation of insolvency proceedings” under , *inter alia*, the BIA.

Houlden, Morawetz & Sarra (eds.), *The 2010 Annotated Bankruptcy and Insolvency Act*, (Carswell, 2010)

18. This Court has a broad discretion under s. 49 to make “other orders” as it considers appropriate:

49(1) If an order recognizing a foreign proceeding is made, the court may, on application by the foreign representative who applied for the order, if the court is satisfied that it is necessary for the protection of the debtor company's property or the interests of a creditor or creditors, make any order that it considers appropriate [...]

19. Again, the commentary notes that section 49(3) clarifies that court orders made under subsection 49(1) do not prevent the commencement or continuation of proceedings in respect of the debtor company under, *inter alia*, the BIA.

20. In this case, a limited lift of the stay of proceedings imposed under the Recognition Order is necessary to permit the Foreign Debtors to file an assignment for a bankruptcy order.

Jetsgo Corporation [2005] Q.J. No. 2996 (S.C.) at para. 16

21. The bankruptcy of the Foreign Debtors is desired, in turn, to pursue a preference action in order to protect the Foreign Debtors' estate and to protect the interest of their creditors.

22. It is therefore submitted that it is appropriate for this Honourable Court to use its broad discretion to lift the stay to permit the bankruptcy filing.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 19th day of January, 2010.



Ogilvy Renault LLP

TAB A

SCHEDULE "A"
LIST OF AUTHORITIES

1. Houlden, Morawetz & Sarra (eds.), *The 2010 Annotated Bankruptcy and Insolvency Act*, (Carswell, 2010)
2. *Jetsgo Corporation* [2005] Q.J. No. 2996 (S.C.) at para. 16

THE 2010 ANNOTATED BANKRUPTCY AND INSOLVENCY ACT

Including
General Rules under the Act
Orderly Payment of Debts Regulations
Tariffs
Companies' Creditors Arrangement Act
Farm Debt Mediation Act
Wage Earner Protection Program Act
Directives and Circulars

The Honourable L. W. Houlden, B.A., LL.B.
Formerly a Judge of the Court of Appeal for Ontario

The Honourable Geoffrey B. Morawetz, B.A., LL.B.
of the Superior Court of Justice

Dr. Janis P. Sarra, B.A., M.A., LL.B., LL.M., S.J.D.
of University of British Columbia
Faculty of Law and the Ontario Bar

STATUTES OF CANADA ANNOTATED

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business and financial affairs in Canada. The order must be consistent with orders that would be made under the *CCAA*: s. 49 (2007, c. 36 proclaimed in force as of September 18, 2009).

Section 50 is the same as the previous s. 18.6 (3) of the *CCAA*; the court has authority to impose whatever terms and conditions it deems appropriate in respect of proceedings. Section 51 gives the foreign representative the same standing to initiate or continue insolvency proceedings under the *CCAA* as if the foreign representative were the debtor or a creditor (2007, c. 36 proclaimed in force as of September 18, 2009). The purpose of s. 52 is to enable courts and insolvency administrators from two or more countries to be achieve optimal results by mandating cross-border cooperation.

N§217 — Stay of Proceedings

Section 48 provides for a stay of proceedings when the court grants an order recognizing a foreign main proceeding. The stay of proceedings is necessary to allow steps to be taken to organize an orderly and equitable cross-border insolvency proceeding. Section 48(2) ensures that such orders are consistent with any orders that may be made under the *CCAA* (2007, c. 36 proclaimed in force as of September 18, 2009).

Section 48(3) ensures that existing proceedings commenced under the *CCAA* are not subject to a stay when the court grants an order recognizing a foreign main proceeding with regard to the same debtor. This provision ensures that Canadian proceedings are subject to Canadian insolvency rules. Section 48(4) clarifies that the stay order, pursuant to subsection 48(1) does not prevent anyone, including the foreign representative or foreign creditors, from requesting the commencement or continuation of insolvency proceedings under the *CCAA*, the *BIA* or the *Winding-up and Restructuring Act* (2007, c. 36 proclaimed in force as of September 18, 2009).

N§218 — Call in Aid Foreign Courts

Section 56 allows any person or body appointed to act as a representative in proceedings under the *CCAA*, to be authorized by the court to act abroad as a representative in respect of the proceedings (2007, c. 36 proclaimed in force as of September 18, 2009).

N§219 — Examinations of Debtor or Other Persons

If the court is satisfied that it is necessary for the protection of the debtor company's property or the interests of creditors, the court can order the examination of witnesses, the taking of evidence or the delivery of information concerning the debtor company's property, business and financial affairs, debts, liabilities and obligations: s. 49(1)(b) (2007, c. 36 proclaimed in force as of September 18, 2009).

N§220 — Attornment to the Jurisdiction

An application by a foreign representative for a recognition order does not submit the foreign representative to the jurisdiction of the court for any other purpose except with regard to the costs of the proceedings, but the court may make any order conditional on the compliance by the foreign representative with any other order of the court: s. 57 (2007, c. 36 proclaimed in force as of September 18, 2009).

N§221 — Discretionary Orders Made After Recognition Order

Section 49(1) authorizes the court to grant post-recognition relief. The court is not restricted in its ability to grant any type of relief that is available under Canadian law and that may be

appropriate in the circumstances of the case. Section 49(2) provides that any order must be consistent with any orders that may be made in any proceedings under the *CCAA*. Section 49(3) clarifies that court orders made under subsection 49(1) do not prevent the commencement or continuation of proceedings under the *CCAA*, the *BIA* or the *Winding-up and Restructuring Act* in respect of the debtor company (2007, c. 36 proclaimed in force as of September 18, 2009).

Canadian debtors in a *CCAA* proceeding applied for an order authorizing an interim distribution of funds to a banking syndicate, their major secured creditor under a guarantee of the indebtedness of the entire corporate group, including debtors engaged in Chapter 11 proceedings in the United States. Romaine J. held that it is not necessarily the case that a distribution of funds from the Canadian estate must await the resolution of the Chapter 11 proceedings, as *CCAA* proceedings may advance at a different pace, if the court is satisfied by the evidence before it that it is appropriate to do so. However, here, the potential for prejudice to unsecured creditors outweighed the benefits of an early payment on the guarantee to the lenders and the court declined to make the order: *Re SemCanada Crude Co.* (2009), 2009 CarswellAlta 167, 52 C.B.R. (5th) 131 (Alta. Q.B.); leave to appeal refused (2009), 2009 CarswellAlta 972 (Alta. C.A. [In Chambers]).

N§222 — Cooperation

If an order recognizing a foreign proceeding is made, the court is to cooperate, to the maximum extent possible, with the foreign representative and the foreign court involved in the foreign proceeding: s. 52(1). Every person who exercises powers or performs duties and functions under the *CCAA* proceedings is to cooperate, to the maximum extent possible, with the foreign representative and the foreign court: s. 52(2). Section 52(3) specifies that cooperation may be provided by any appropriate means, including: (a) the appointment of a person to act at the direction of the court; (b) the communication of information by any means considered appropriate by the court; (c) the coordination of the administration and supervision of the debtor company's assets and affairs; (d) the approval by courts of agreements concerning the coordination of proceedings; and (e) the coordination of concurrent proceedings regarding the same debtor company (2007, c. 36 proclaimed in force as of September 18, 2009).

N§223 — Protocols

The courts have in the past endorsed protocols for cooperation of cross-border proceedings. Section 52(3) codifies that authority, specifying that cooperation may be provided by any appropriate means, including the approval or implementation by courts of agreements concerning the coordination of proceedings.

N§224 — Dividends and Property Received by a Creditor in a Foreign Proceeding

Pursuant to s. 60(1), in making a plan of compromise or an arrangement, the following is to be taken into account in the distribution of dividends to the company's creditors in Canada as if they were a part of that distribution: (a) the amount that a creditor receives or is entitled to receive outside Canada by way of a dividend in a foreign proceeding in respect of the company; and (b) the value of any property of the company that the creditor acquires outside Canada on account of a provable claim or that the creditor acquires outside Canada by way of a transfer that, if it were subject to the *CCAA*, would be a preference over other creditors or a transfer at undervalue. The creditor is not entitled to receive a dividend from the distri-

Case Name:
JetsGo Corporation (Arrangement relatif à)

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 1985 c. C-36, as amended: JETSGO CORPORATION, debtor
and
RSM RICHTER INC., monitor
and
MONERIS SOLUTIONS CORPORATION, petitioner**

[2005] Q.J. No. 2996

No.: 500-11-025198-058

Quebec Superior Court
District of Montreal

The Honourable François Rolland, Chief Justice

April 5, 2005.

(18 paras.)

Insolvency -- Legislation -- Companies' Creditors Arrangement Act -- Proceedings in bankruptcy -- Stay of other proceedings -- Motion by a creditor for a limited lift of the Stay of proceedings imposed under the initial order allowed -- The creditor was authorized to issue and serve a Bankruptcy Application -- Bankruptcy and Insolvency Act, s. 2 (1) and s. 2.1.

Motion by Moneris Solutions Corporation (Moneris) for a limited lift of the Stay of proceedings imposed under the initial order -- Acting on behalf of Bank of Montreal, Royal Bank of Canada and Harris Trust and Savings Bank, Moneris alleged to be Jetsgo Corporation's (Jetsgo) largest creditor -- Moneris requested said permission for the sole purpose of issuing, serving and filling the Bankruptcy Application, thereby setting the date of the initial bankruptcy -- HELD: Motion allowed -- In the absence of consent between the parties, the Court could not modify the initial order to provide for a date of bankruptcy -- The date of the bankruptcy must thus be established in accordance with the provisions of the Bankruptcy and Insolvency Act.

Statutes, Regulations and Rules Cited:

Bankruptcy and Insolvency Act, s. 2(1), s. 2.1

Counsel:

Sylvain Rigaud and Louis J. Gouin (Ogilvy Renault), attorneys for Jetsgo Corporation.
Sylvain A. Vauclair (McCarthy Tétrault), attorney for the monitor.
Alain Riendeau (Fasken Martineau DuMoulin), attorney for Moneris Solutions Corporation.

JUDGMENT

- 1 On March 11, 2005, the Court issues an initial order (hereinafter "Initial Order") pursuant to the Companies' Creditors Arrangements Act (hereinafter "CCAA") declaring inter alia that the Debtor, Jetsgo Corporation (hereinafter "Jetsgo"), is a company to which the CCAA applies, granting a stay of proceedings with respect to Jetsgo and its assets and property up until and including April 11, 2005.
- 2 Moneris Solutions Corporation (hereinafter "Moneris") is requesting from this Court an Order providing for a limited lift of the stay of proceedings imposed under the initial order to permit Moneris to issue and serve and Application for Bankruptcy Order (hereinafter "Bankruptcy Application").
- 3 Moneris is a creditor of Jetsgo and, together with Bank of Montreal, Royal Bank of Canada and Harris Trust and Savings Bank for whom Moneris is the duly authorized agent in respect of these proceedings, expects to be the largest creditor of Jetsgo as a result of claims against Jetsgo in respect of Visa and Mastercard credit card chargebacks caused by Jetsgo's cessation of operation on March 11, 2005.
- 4 Moneris requests said permission for the sole purpose of serving and filing the Bankruptcy Application.
- 5 Moneris does not intend to proceed and present the Bankruptcy Application at this time, the mere filing of the Bankruptcy Application being made for the purposes of setting the "date of the initial bankruptcy event" as that term is defined in section 2(1) of the Bankruptcy and Insolvency Act ("BIA") in order preserve the rights of any trustee in bankruptcy of Jetsgo to pursue any reviewable transactions, settlements, improperly declared dividends and fraudulent preferences and conveyances which may have taken place during the statutory time period prescribed by the BIA, in the event of the termination of the CCAA stay period;
- 6 Jetsgo contests the Motion and suggests that the initial order be modified to indicate that in the event of bankruptcy, the bankruptcy date is the date determined by the parties.
- 7 Moneris does not agree.
- 8 Jetsgo contests this Motion on the ground that the filing of a petition in bankruptcy could colour the file eventhough it would have no legal effect on the CCAA arrangement.
- 9 In some cases, the Courts have agreed to modify the initial order in order to provide for a date of bankruptcy. This was done by consent of the parties.
- 10 Article 2 (1) of the BIA states :

["date of the initial bankruptcy event" "ouverture de la faillite"] "date of the initial bankruptcy event", in respect of a person, means the earliest of the date of filing of or making of
 - a) assignment by or in respect of the person,
 - b) a proposal by or in respect of the person,
 - c) a notice of intention by the person,

- d) the first petition for a receiving person order against the person, in any case,
- (i) referred to in paragraph 50.4(8) (a) or 57(a) or subsection 61(2), or
- (ii) where a notice of intention to make a proposal has been filed under section 50.4 or a proposal has been filed under section 62 in respect of the person and the person files an assignment before the court has approved the proposal, or
- e) the petition in respect of which a receiving order is made, in the case of a petition other than one referred to in paragraph (d)".

11 Article 2.1 of the Bankruptcy Insolvency states :

"2.1 For the purposes of this Act, the bankruptcy or putting into bankruptcy of a person occurs at the time or date of

- (a) the granting of a receiving order against the person;
- (b) the filing of an assignment by or in respect of the person; or
- (c) the event that causes an assignment by the person to be deemed".

12 The date of the bankruptcy is defined by the (BIA) and not by consent of the parties or by an event not foreseen in the (BIA).

13 In consequence, the date of the bankruptcy is established in accordance with the BIA provisions.

14 WHEREFORE, THE COURT :

15 GRANTS the motion;

16 GRANTS a lift of the stay of proceedings pursuant to the initial order issued by this Court on March 11, 2005 in the present file for the purposes of allowing Petitioner Moneris Solutions to issue and serve a Bankruptcy Application.

17 ALLOWS Petitioner Moneris Solutions Corporation to issue and serve a Bankruptcy Application.

18 THE WHOLE without costs.

FRANÇOIS ROLLAND, Chief Justice

cp/i/qlnla

TAB B

SCHEDULE "B"
RELEVANT STATUTES

Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended

48. (1) Subject to subsections (2) to (4), on the making of an order recognizing a foreign proceeding that is specified to be a foreign main proceeding, the court shall make an order, subject to any terms and conditions it considers appropriate,

(a) staying, until otherwise ordered by the court, for any period that the court considers necessary, all proceedings taken or that might be taken against the debtor company under the Bankruptcy and Insolvency Act or the Winding-up and Restructuring Act;

(b) restraining, until otherwise ordered by the court, further proceedings in any action, suit or proceeding against the debtor company;

(c) prohibiting, until otherwise ordered by the court, the commencement of any action, suit or proceeding against the debtor company; and

(d) prohibiting the debtor company from selling or otherwise disposing of, outside the ordinary course of its business, any of the debtor company's property in Canada that relates to the business and prohibiting the debtor company from selling or otherwise disposing of any of its other property in Canada.

Scope of order

(2) The order made under subsection (1) must be consistent with any order that may be made under this Act.

When subsection (1) does not apply

(3) Subsection (1) does not apply if any proceedings under this Act have been commenced in respect of the debtor company at the time the order recognizing the foreign proceeding is made.

Application of this and other Acts

(4) Nothing in subsection (1) precludes the debtor company from commencing or continuing proceedings under this Act, the Bankruptcy and Insolvency Act or the Winding-up and Restructuring Act in respect of the debtor company.

2005, c. 47, s. 131.

Other orders

49. (1) If an order recognizing a foreign proceeding is made, the court may, on application by the foreign representative who applied for the order, if the court is satisfied that it is necessary for the protection of the debtor company's property or the interests of a creditor or creditors, make any order that it considers appropriate, including an order

(a) if the foreign proceeding is a foreign non-main proceeding, referred to in subsection 48(1);

(b) respecting the examination of witnesses, the taking of evidence or the delivery of information concerning the debtor company's property, business and financial affairs, debts, liabilities and obligations; and

(c) authorizing the foreign representative to monitor the debtor company's business and financial affairs in Canada for the purpose of reorganization.

Restriction

(2) If any proceedings under this Act have been commenced in respect of the debtor company at the time an order recognizing the foreign proceeding is made, an order made under subsection (1) must be consistent with any order that may be made in any proceedings under this Act.

Application of this and other Acts

(3) The making of an order under paragraph (1)(a) does not preclude the commencement or the continuation of proceedings under this Act, the Bankruptcy and Insolvency Act or the Winding-up and Restructuring Act in respect of the debtor company.

2005, c. 47, s. 131.

AND IN THE MATTER OF JAMES ROBERT TUCKER, RICHARD HEIS AND ALLAN WATSON GRAHAM OF
KPMG AS JOINT ADMINISTRATORS

AND IN THE MATTER OF AERO INVENTORY (UK) LIMITED AND AERO INVENTORY PLC

ONTARIO
SUPERIOR COURT OF JUSTICE -
COMMERCIAL LIST

Proceeding commenced at Toronto

FACTUM OF THE APPLICANTS
(RETURNABLE JANUARY 21, 2010)

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