**Court File No. CV-24-00730212-00CL** 

CHESSWOOD GROUP LIMITED, CASE FUNDING INC., CHESSWOOD HOLDINGS LTD., CHESSWOOD US ACQUISITIONCO LTD., LEASE-WIN LIMITED, WINDSET CAPITAL CORPORATION, CHESSWOOD CAPITAL MANAGEMENT INC., CHESSWOOD CAPITAL MANAGEMENT USA INC., 942328 ALBERTA INC., 908696 ALBERTA INC., 1000390232 ONTARIO INC. and CGL HOLDCO, LLC

SUPPLEMENT TO THE EIGHTH REPORT OF FTI CONSULTING CANADA INC., AS MONITOR

**September 26, 2025** 

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# 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 A PLAN OF COMPROMISE OR ARRANGEMENT OF CHESSWOOD GROUP LIMITED, CASE FUNDING INC., CHESSWOOD HOLDINGS LTD., CHESSWOOD US ACQUISITIONCO LTD., LEASE-WIN LIMITED, WINDSET CAPITAL CORPORATION, CHESSWOOD CAPITAL MANAGEMENT INC., CHESSWOOD CAPITAL MANAGEMENT USA INC., 942328 ALBERTA INC., 908696 ALBERTA INC., 1000390232 ONTARIO INC. and CGL HOLDCO, LLC

(each, a "CCAA Party", and collectively, the "CCAA Parties")

# SUPPLEMENT TO EIGHTH REPORT TO THE COURT SUBMITTED BY FTI CONSULTING CANADA INC., IN ITS CAPACITY AS MONITOR

#### A. INTRODUCTION

1. On October 29, 2024 (the "Filing Date"), the Ontario Superior Court of Justice (Commercial List) (the "Court") made an Order (the "Initial Order") under the Companies' Creditors Arrangement Act, R.S.C. 1985, c. C-36, as amended (the "CCAA") in respect of the CCAA Parties (the proceedings commenced pursuant to the Initial Order, the "CCAA Proceedings"). Pursuant to the Initial Order, among other things, FTI Consulting Canada Inc. ("FTI") was appointed as monitor of the CCAA Parties (in such capacity, the "Monitor") with expanded powers.

2. On November 7, 2024, the Court issued an amended and restated Initial Order (the "ARIO"), which, among other things, extended the period of the Court-ordered stay of

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The Initial Order applied to three additional entities, Pawnee Leasing Corporation ("Pawnee"), Tandem Finance Inc. ("Tandem"), and Waypoint Investment Partners Inc. ("Waypoint"), and did not include CGL Holdco LLC ("ResidualCo"). As discussed below, (i) pursuant to the Pawnee RVO, the shares of Pawnee and Tandem were sold by Chesswood U.S. Acquisitionco Ltd. and certain retained assets and liabilities were vested in ResidualCo, and Pawnee and Tandem were removed from, and ResidualCo was added to, the CCAA Proceedings, and (ii) pursuant to the Waypoint AVO, the shares of Waypoint were sold by Chesswood Capital Management Inc., and Waypoint was removed from the CCAA Proceedings.

proceedings in respect of the CCAA Parties under the CCAA until January 31, 2025 (the "**Stay Period**"). The Stay Period has subsequently been extended by the Court until and including October 3, 2025.

- 3. The Monitor filed its Eighth Report to the Court dated September 9, 2025 (the "Eighth Report") in these CCAA Proceedings in connection with:
  - (a) a motion returnable on September 16, 2025, seeking an approval and vesting order (the "Easy Legal AVO"), approving an asset purchase agreement among 1000390232 Ontario Inc. and Chesswood Group Limited, as vendors, and 17208260 Canada Inc., as purchaser, dated August 27, 2025, in respect of the 'Easy Legal' business; and
  - (b) a motion returnable on September 16, 2025, seeking an Order terminating these CCAA Proceedings upon completion of the limited remaining administration that is required in these proceedings, including the wind-down of various CCAA Parties, and the filing of a Monitor's certificate, along with approval of the Monitor's activities, fees and disbursements, and its counsel's fees and disbursements (the "CCAA Termination Motion").
- 4. On September 16, 2025, the Court issued the Easy Legal AVO, and, on September 23, the Transactions (as defined in the Easy Legal AVO) were completed.
- 5. Prior to the hearing of the CCAA Termination Motion, the Monitor determined, in consultation with the Pre-Filing Agent, that the CCAA Termination Motion should be deferred to allow the Monitor to consider various matters relating to the books and records of the CCAA Parties that may need to be accessed by parties who have or may have claims (the "Litigation Claims") against the directors and officers of the CCAA Parties and by any defendants thereto, including the insurance maintained by the CCAA Parties in respect of any such claims. Accordingly, the Monitor is not proceeding with a motion to terminate these CCAA Proceedings at this time.
- 6. The Monitor is filing this supplement to the Eighth Report (the "Supplemental Report") in support of a motion returnable October 2, 2025 (the "Fifth Stay Extension and

Ancillary Matters Motion"), seeking an order (the "Fifth Stay Extension and Ancillary Matters Order"):

- (a) extending the Stay Period until and including January 30, 2026;
- (b) granting certain ancillary relief previously sought as part of the CCAA Termination Motion, as supplemented herein, including:
  - (i) approving the Supplement to the Fifth Report, the Sixth Report, the Seventh Report, the Eighth Report, this Supplemental Report, and the activities, conduct and decisions of FTI and the Monitor set out therein and herein;
  - (ii) approving the fees and disbursements of the Monitor and Osler; and
  - (iii) authorizing each of the Canadian CCAA Parties to make an assignment in bankruptcy pursuant to the BIA and empowering the Monitor, for and on behalf of the Canadian CCAA Parties, to file any such assignments, and seeking procedural consolidation of such proceedings;
- (c) approving the proposed Records Protocol (as defined below);
- (d) authorizing the Monitor to make certain additional distributions, as described below; and
- (e) granting related relief.
- 7. The Monitor advised in the Eighth Report that it was in discussions with the Pre-Filing Lenders and their counsel regarding certain relief sought as part of the CCAA Termination Motion. The Monitor, Pre-Filing Lenders, and their counsel remain in discussions regarding certain relief contained in the Fifth Stay Extension and Ancillary Matters Order, and the Monitor anticipates receiving confirmation from the Pre-Filing Lenders that they support the request for the Fifth Stay Extension and Ancillary Matters Order prior to the hearing of the Fifth Stay Extension and Ancillary Matters Motion.
- 8. Additional background regarding these CCAA Proceedings is contained in the Eighth Report.

#### B. TERMS OF REFERENCE

- 9. Capitalized terms not otherwise defined herein have the meanings ascribed to them in the ARIO or the Eighth Report, as applicable.
- 10. In preparing this Supplemental Report, the Monitor has relied upon audited and unaudited financial information of the CCAA Parties' books and records, certain financial information and forecasts prepared by the CCAA Parties, discussions with various stakeholders and parties, including senior management of the CCAA Parties ("Management") and their respective advisors, and information and documentation provided by the Pre-Filing Agent and its legal counsel, Blake, Cassels & Graydon LLP (collectively, the "Information").

#### 11. Except as otherwise described in this Supplemental Report:

- (a) the Monitor has not audited, reviewed or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would comply with Generally Accepted Assurance Standards pursuant to the Chartered Professional Accountants of Canada Handbook; and
- (b) the Monitor has not examined or reviewed the financial forecasts or projections referred to in this Supplemental Report in a manner that would comply with the procedures described in the Chartered Professional Accountants of Canada Handbook.
- 12. Future-oriented financial information reported in, or relied on, in preparing this Supplemental Report is based on Management's assumptions regarding future events. Actual results will vary from these forecasts and such variations may be material.
- 13. The Monitor has prepared this Supplemental Report in connection with its Fifth Stay Extension and Ancillary Matters Motion. This Supplemental Report should not be relied on for any other purpose.

# C. EXTENSION OF THE STAY PERIOD AND CERTAIN WIND-DOWN ACTIVITIES

#### Stay Period

- 14. As set out in further detail beginning at paragraph 30 of the Eighth Report, the administration of these CCAA Proceedings is nearly complete, though certain Wind-Down Activities remain to be completed, including, without limitation, assisting the CCAA Parties with preparing and, where necessary, submitting, certain tax filings and tax returns. Further, as noted above, the Monitor is seeking approval of the proposed Records Protocol as described below. The Monitor is of the view that extending the stay of proceedings will provide the stability necessary to complete the remaining administration of these CCAA Proceedings.
- 15. Accordingly, the Monitor is seeking an extension of the Stay Period up to and including January 30, 2026.
- 16. As is demonstrated in the cash flow forecast attached as Appendix "A" hereto (the "September 2025 Forecast"), the CCAA Parties are forecast to have sufficient liquidity to fund their obligations and costs of the CCAA Proceedings through the end of the extended Stay Period. The September 2025 Forecast is summarized below:

#### (\$USD in thousands)

Cash Flow Forecast for the 22 Week Period Ended	January	y 30, 2026
(\$USD in thousands)		Total
Disbursements		
Operating Disbursements		
Payroll	\$	(221)
Operating Expenses		(703)
Taxes		(55)
Total Operating Disbursements	\$	(979)
Net Cash from Operations	\$	(979)
Financing Disbursements		
Interest Expenses		(1,046)
Restructuring Disbursements		
Restructuring Legal and Professional Costs		(2,897)
Net Cash Flows	\$	(4,922)
Cash		
Beginning Balance	\$	755
Net Cash Flows		(4,922)
Transaction Proceeds Holdback		4,439
Ending Balance	\$	271

#### 17. The Monitor supports extending the Stay Period for the following reasons:

- (a) additional time is required to complete certain Wind-Down Activities, including to carry out the proposed Records Protocol;
- (b) as indicated by the September 2025 Forecast, the CCAA Parties are forecast to have sufficient liquidity to fund their operating costs and other expenses during the requested extension of the Stay Period;
- (c) based on the information currently available to it, the Monitor believes that no creditor of the CCAA Parties would be materially prejudiced by the extension of the Stay Period;
- (d) the CCAA Parties, under the supervision of the Monitor, are acting in good faith and with due diligence; and
- (e) the CCAA Parties have acted in good faith and with due diligence in the CCAA Proceedings since the commencement of the CCAA Proceedings.

18. Currently, the Monitor does not anticipate seeking further extensions of the Stay Period beyond the requested extension to January 30, 2025. Rather, the Monitor expects that it will be in a position to seek a termination of the CCAA Proceedings in advance of the expiry of the Stay Period, as extended.

#### Bankruptcy Authorizations

19. For the reasons set out at paragraphs 41-46 of the Eighth Report, including to appropriately and efficiently wind down the remaining estates of the CCAA Parties, the Monitor is proposing that the Canadian CCAA Parties make assignments in bankruptcy under the BIA, which ensuing bankruptcies would be administered on a procedurally consolidated basis. The proposed Fifth Stay Extension and Ancillary Matters Order authorizes, but does not require, each of the Canadian CCAA Parties to make an assignment in bankruptcy under the BIA, and authorizes the Monitor to file any such assignments for and on behalf of the Canadian CCAA Parties and to serve as the bankruptcy trustee in the event of such assignments.

#### Additional Distributions

- 20. As noted in the Pre-Filing Report of Monitor, in its capacity as Proposed Monitor, dated October 29, 2024, the Monitor's counsel has confirmed the validity and enforceability of the Pre-Filing Agent's security over the property and assets of the CCAA Parties. On this basis, and after repayment in full of the DIP Facility approved in the ARIO, the Court has authorized the Monitor to distribute the cash proceeds of transactions previously approved in these CCAA Proceedings to the Pre-Filing Agent for and on behalf of the Pre-Filing Lenders.
- 21. The Monitor is also in receipt of approximately US\$183,000 in payments received by ResidualCo pursuant to the terms of the Bishop LLC Agreement prior to completion of the Bishop Transactions (each as defined in the Seventh Report) ("Bishop Residual Amounts") and anticipates receiving certain tax refunds and other miscellaneous amounts (e.g., partial refunds of prepaid insurance premiums) in the near term ("Other Residual Amounts"). The Monitor is seeking authorization to make distributions of the Bishop

Residual Amounts and any Other Residual Amounts to the Pre-Filing Agent, for and on behalf of the Pre-Filing Lenders. As noted in the Eighth Report, the Pre-Filing Lenders are expected to face a significant shortfall on repayment of the secured obligations owing under the Existing Credit Agreement.<sup>2</sup>

#### The proposed Records Protocol

- 22. Over 350 boxes of the CCAA Parties' documents and records are currently being held by a third-party records and information management company (collectively, the "Physical Documents").
- 23. The Monitor continues to retain access to certain of the CCAA Parties' electronic records, including in the cloud or on third party servers (the "Electronic Records").
- 24. The Monitor continues to make payments to ensure ongoing storage of the Physical Documents and to maintain access to the Electronic Records (together, the "Books and Records").
- 25. The Monitor is in the process of identifying which of the Books and Records must be retained as required by the *Income Tax Act* (Canada) (such records, the "**Retained Records**"). The Retained Records will be retained for the period required under the *Income Tax Act* at a third-party record and information company (and arrangements will be made for their destruction thereafter), and it is anticipated that these costs, which have been included as part of the September 2025 Forecast, will be prepaid from the CCAA Parties' estates prior to the termination of the CCAA Proceedings.
- 26. Given that the CCAA Parties' businesses have been sold and there are no remaining business activities, the Books and Records other than the Retained Records, which are required by law to be retained, are not required by and are of minimal value to the CCAA Parties (the "Subject Records"). Maintaining the Subject Records would result in additional costs to the CCAA Parties' estates, which, counsel to the Pre-Filing Agent has

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<sup>&</sup>lt;sup>2</sup> As noted in the Eighth Report (at para 37), the outstanding obligations under the Existing Credit Agreement exceed \$90 million.

advised, the Pre-Filing Lenders are not prepared to fund from their collateral, which includes all of the CCAA Parties' remaining assets. While the total estimated costs to retain Subject Records would need to be quantified and would depend on length, form and type of retention, no such amounts are currently included as part of the September 2025 Forecast.

- 27. Given the potential Litigation Claims, other parties may have an interest in preserving the Subject Records. Therefore, the Monitor is seeking authorization to address the retention and destruction of the Books and Records in accordance with the following protocol (the "Records Protocol"):
  - (a) The Monitor shall provide notice of the Records Protocol to the following parties by no later than October 10, 2025:
    - (i) parties on the service list in these CCAA Proceedings;
    - (ii) all purchasers of any assets acquired in transactions previously approved by the Court in these CCAA Proceedings;
    - (iii) the CCAA Parties' directors and officers insurer; and
    - (iv) parties to existing litigation claims commenced against the CCAA Parties or any of their current or former directors and officers (in such capacities) known to the Monitor, including the following existing class actions: *McCormick v Chesswood Group Ltd. et al.*, Court File No. CV-24-00729269-00CP and *Javlee Construction Limited v Chesswood Group Ltd. et al.*, Court File No. CV-24-00726729-00CP.
  - (b) The Monitor shall promptly provide notice of the Records Protocol to any additional parties to litigation claims commenced following October 10, 2025, and known to the Monitor prior to the Request Deadline (as defined below) against the CCAA Parties or any of their current or former directors and officers (in such capacities).
  - (c) Interested parties may submit a written request (each such a request, a "Request") to the Monitor in respect of the retention of any of the Books and Records by no later than 5:00 p.m. prevailing Eastern Time on November 28, 2025 (the "Request")

**Deadline**"). Such Request will identify, with as much specificity as reasonably possible, the particular Books and Records to which such party has an interest (the "Requested Records").

- (d) If one or more parties makes a Request, those parties shall bear the costs associated with any further retention of the applicable Requested Records, including the Monitor's and its counsel's fees associated therewith.
- (e) The Monitor shall be authorized to make arrangements to destroy at any time following December 31, 2025 any Subject Records that are not subject to a Request and identified as Requested Records prior to the Request Deadline, without further notice to any person or order of the Court.
- If Requests are received by the Monitor on or before the Request Deadline, and an agreement between the requesting parties, other parties to the Litigation Claims and the Monitor has not been reached by December 19, 2025, regarding the terms of retention and access, including the bearing of costs (and the sharing of costs as between requesting parties if more than one Request is made), a requesting party, other parties to (or with an interest in) the Litigation Claims or the Monitor may seek directions from the Court regarding retention and access prior to the termination of the CCAA Proceedings.
- 28. The Monitor's notice will include disclosure of the Records Protocol, including the applicable deadlines and other requirements for submitting a Request.
- 29. The September 2025 Forecast does not include any costs for retrieving, reviewing and providing Subject Records (or Retained Records) to requesting parties. Counsel to the Pre-Filing Agent has advised that the Pre-Filing Lenders are not prepared to permit their collateral to be used to fund such costs. Accordingly, the proposed Records Protocol contemplates that a requesting party will be required to cover the costs of retaining and obtaining access to the requested Subject Records (or Retained Records).

#### D. APPROVAL OF FEES AND ACTIVITIES

- 30. Commencing at paragraph 47 thereof, the Eighth Report includes information relating to the Monitor's request for approval of (i) its fees and disbursements for the period of March 1, 2025, to July 31, 2025 (the "Initial Monitor Approval Period"), and (ii) the fees and disbursements of Osler for the period of February 12, 2025, to July 31, 2025 (the "Initial Counsel Approval Period").
- 31. Since delivery of the Eighth Report, the Monitor and Osler have each rendered an additional account in respect of these CCAA Proceedings, in each case for the period from August 1, 2025, to August 31, 2025 (the "Supplemental Approval Period"). Accordingly, the Monitor is also seeking approval of its fees and disbursements, and the fees and disbursements of Osler, for the Supplemental Approval Period.
- 32. The affidavit of Jeffrey Rosenberg made September 25, 2025 (the "Supplemental Rosenberg Affidavit"), attached as Appendix "B" hereto, includes, at Exhibit "A" thereto, a copy of the invoice rendered by the Monitor in respect of the Supplemental Approval Period, which has been redacted to protect certain privileged and commercially sensitive information.
- 33. For the Supplemental Approval Period, the Monitor's account totals \$282,275.00 in fees, \$35.40 in expenses and disbursements, and \$36,700.35 in HST for a total amount of \$319,010.75. A schedule for the account rendered by the Monitor for the fees and disbursements incurred in connection with the activities during the Supplemental Approval Period is included at Exhibit "B" to the Supplemental Rosenberg Affidavit. A summary of the personnel, hours and hourly rates charged by the Monitor during the Supplemental Approval Period is included at Exhibit "C" to the Supplemental Rosenberg Affidavit.
- 34. For the overall period from the commencement of the Initial Monitor Approval Period to the end of the Supplemental Approval Period, the Monitor's accounts total \$3,357,423.00 in fees, \$25,362.38 in expenses and disbursements, and \$439,762.10 in HST for a total amount of \$3,822,547.48.

- 35. The affidavit of Sean Stidwill made September 25, 2025 (the "Supplemental Stidwill Affidavit" and together with the Supplemental Rosenberg Affidavit, the "Supplemental Fee Affidavits"), attached as Appendix "C" hereto, includes, at Exhibit "A" thereto, a copy of the invoice rendered by Osler in respect of the Supplemental Approval Period, which has been redacted to protect certain privileged and commercially sensitive information.
- 36. For the Supplemental Approval Period, Osler's account totals \$67,846.00 in fees, \$1,518.83 in disbursements, and \$8,973.36 in HST for a total amount of \$78,338.19. A schedule for the account rendered by counsel to the Monitor for the fees and disbursements incurred during the Supplemental Approval Period is included at Exhibit "B" to the Supplemental Stidwill Affidavit. A summary of the personnel, hours and hourly rates charged by Osler during the Supplemental Approval Period is included at Exhibit "C" to the Supplemental Stidwill Affidavit.
- 37. For the overall period from the commencement of the Initial Counsel Approval Period to the end of the Supplemental Approval Period, Osler's accounts total \$1,259,909.00 in fees, \$7,400.79 in disbursements, and \$164,618.08 in HST for a total amount of \$1,431,927.87.
- 38. The Monitor submits that the fees and disbursements incurred by the Monitor and counsel to the Monitor, as more particularly described in the Eighth Report and the Supplemental Fee Affidavits, are reasonable in the circumstances and have been validly incurred in accordance with the provisions of the Orders issued in respect of these CCAA Proceedings. Additionally, the Monitor believes that the hourly rates charged by its counsel are consistent with the rates charged by corporate law firms practicing in the area of corporate insolvency and restructuring law in Toronto.
- 39. The Monitor respectfully requests the approval of the fees and disbursements of the Monitor and counsel to the Monitor as set out in the Eighth Report and the Supplemental Fee Affidavits.
- 40. At paragraph 57 of the Eighth Report, the Monitor advised as to its request for approval of the Supplement to the Fifth Report, the Sixth Report, the Seventh Report and the Eighth Report and the activities of the Monitor described therein. The Monitor is also seeking approval of this Supplemental Report and the activities of the Monitor described herein.

This Court previously approved the Monitor's prior reports and the activities and conduct set out therein.

### E. CONCLUSION

41. For the reasons set out in this Supplemental Report, the Monitor is of the view that the Fifth Stay Extension and Ancillary Matters Order should be granted.

All of which is respectfully submitted this 26<sup>th</sup> day of September, 2025.

### FTI Consulting Canada Inc.

In its capacity as Monitor of Chesswood Group Limited, Case Funding Inc., Chesswood Holdings Ltd., Chesswood US Acquisitionco Ltd., Lease-Win Limited, Windset Capital Corporation, Chesswood Capital Management Inc., Chesswood Capital Management USA Inc., 942328 Alberta Inc., 908696 Alberta Inc., 1000390232 Ontario Inc. and CGL Holdco, LLC and not in its personal or corporate capacity

Jeffrey Rosenberg Senior Managing Director Jodi Porepa

Senior Managing Director

# APPENDIX "A" – SEPTEMBER 2025 FORECAST

(see attached)

#### **Chesswood Group Limited**

#### Consolidated Cash Flow Forecast

DRAFT FOR DISCUSSION PURPOSES ONLY - SUBJECT TO MATERIAL CHANGE

(\$USD in thousands)	Act	tual Ac	tual Fo	recast Fo	recast For	ecast For	ecast Fo	recast Fo	ecast Fo	ecast For	ecast Fore	cast For	ecast For	ecast For	ecast For	ecast Fore	cast For	ecast Fore	ecast For	ecast For	recast For	ecast For	ecast	
Forecast Week Ending		05-Sep-25	12-Sep-25	19-Sep-25	26-Sep-25	03-Oct-25	10-Oct-25	17-Oct-25	24-Oct-25	31-Oct-25	07-Nov-25	14-Nov-25	21-Nov-25	28-Nov-25	05-Dec-25	12-Dec-25	19-Dec-25	26-Dec-25	02-Jan-26	09-Jan-26	16-Jan-26	23-Jan-26	30-Jan-26	22 Weeks
Forecast Week	[1]	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	Total
Disbursements																								
Operating Disbursements																								
Payroll	[2] \$	- \$	(38) \$	- \$	(183) \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	- \$	-	\$ (22
Operating Expenses	[3]	(2)	(35)	(2)	(84)	(80)	(55)	(55)	(55)	(55)	(25)	(25)	(25)	(20)	(20)	(20)	(20)	(20)	(45)	(15)	(15)	(15)	(15)	(70:
Taxes	[4]	=	-		-	-	-	-	(55)	-	-	-	-	-	-	-		-	-	-	-	-	-	(5)
Total Operating Disbursements	\$	(2) \$	(73) \$	(2) \$	(267) \$	(80) \$	(55) \$	(55) \$	(110) \$	(55) \$	(25) \$	(25) \$	(25) \$	(20) \$	(20) \$	(20) \$	(20) \$	(20) \$	(45) \$	(15) \$	(15) \$	(15) \$	(15)	\$ (97
Net Cash from Operations	\$	(2) \$	(73) \$	(2) \$	(267) \$	(80) \$	(55) \$	(55) \$	(110) \$	(55) \$	(25) \$	(25) \$	(25) \$	(20) \$	(20) \$	(20) \$	(20) \$	(20) \$	(45) \$	(15) \$	(15) \$	(15) \$	(15)	\$ (97
Financing Disbursements																								
Interest Expenses	[5]	(351)	-	-	-	(348)	-	-	-	-	(348)	-	-	-	-	-	-	-	-	-	-	-	-	(1,04
Restructuring Disbursements																								
Restructuring Legal and Professional Costs	[6]	-	(258)	(256)	(413)	(133)	(18)	(98)	(229)	(21)	-	(91)	(157)	(200)	(10)	(36)	(56)	(73)	-	=	(112)	(91)	(643)	(2,89
Net Cash Flows	\$	(353) \$	(331) \$	(258) \$	(680) \$	(561) \$	(73) \$	(153) \$	(339) \$	(76) \$	(373) \$	(116) \$	(182) \$	(220) \$	(30) \$	(56) \$	(76) \$	(93) \$	(45) \$	(15) \$	(127) \$	(106) \$	(658)	\$ (4,92
Cash																								
Beginning Balance	\$	755 \$	755 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750	\$ 75
Net Cash Flows		(353)	(331)	(258)	(680)	(561)	(73)	(153)	(339)	(76)	(373)	(116)	(182)	(220)	(30)	(56)	(76)	(93)	(45)	(15)	(127)	(106)	(658)	(4,92
Transaction Proceeds Holdback	[7]	353	328	258	680	561	73	153	339	76	373	116	182	220	30	56	76	93	45	15	127	106	180	4,43
Ending Balance	\$	755 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	750 \$	271	\$ 27
Transaction Proceeds Holdback																								
Opening Balance	[7] \$	5,440 \$	5,087 \$	4,759 \$	4,501 \$	2,821 \$	2,260 \$	2,187 \$	2,034 \$	1,695 \$	1,619 \$	1,246 \$	1,130 \$	948 \$	728 \$	698 \$	642 \$	565 \$	473 \$	428 \$	413 \$	286 \$	180	\$ 5,44
(-) Repayment of Pre-Filing Revolver		-	-	-	(1,000)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,00
(-) Transfer to Company		(353)	(328)	(258)	(680)	(561)	(73)	(153)	(339)	(76)	(373)	(116)	(182)	(220)	(30)	(56)	(76)	(93)	(45)	(15)	(127)	(106)	(180)	(4,44
Closing Balance	\$	5,087 \$	4,759 \$	4,501 \$	2,821 \$	2,260 \$	2,187 \$	2,034 \$	1,695 \$	1,619 \$	1,246 \$	1,130 \$	948 \$	728 \$	698 \$	642 \$	565 \$	473 \$	428 \$	413 \$	286 \$	180 \$	-	\$ -
Revolver Balance		66,096	66,176	66,256	65,335	65,066	65,145	65,224	65,302	65,381	65,113	65,191	65,270	65,349	65,428	65,507	65,586	65,665	65,745	65,824	65,904	65,983	66,063	66,06
Total Debt	¢	66,096 \$	66.176 \$	66,256 \$	65,335 \$	65.066 \$	65,145 \$	65.224 \$	65,302 \$	65,381 \$	65,113 \$	65,191 \$	65,270 \$	65,349 \$	65,428 \$	65,507 \$	65,586 \$	65,665 \$	65,745 \$	65,824 \$	65,904 \$	65,983 \$	66,063	\$ 66,06
Total Dept	ş	Ç 060'00	00,1/0 \$	00,230 Ş	چ دودر <i>د</i> ن	ου,οοο γ	03,145 \$	03,224 3	03,302 \$	03,361 Ş	05,115 \$	03,131 3	05,270 \$	03,349 3	03,428 \$	υσ,συ/ ຈ	υυ,υου φ	U3,U03 3	05,745 \$	03,824 3	05,304 \$	υ <i>ο</i> ,σοο φ	00,003	2 00,00

#### Notes to the Consolidated Cash Flow Forecast:

- [1] The purpose of the Cash Flow Forecast is to estimate the liquidity requirements of Chesswood Group Limited and its subsidiaries ("Chesswood" or the "Company"). The forecast above is presented in United States Dollars. The Cash Flow Forecast is on a cash-basis only and does not include timing differences for cash in transit.
- [2] Forecast Payroll is based on recent payroll amounts and future forecast amounts.
- [3] Forecast Operating Expenses includes general and administrative expenses including rt, Insurance, and other costs necessary for operation. This also includes estimates for certain Pawnee post-closing costs including costs associated with excluded contracts and any costs necessary to complete the sale/wind-up of Easy Legal and the remaining Chesswood entities.
- [4] The forecast assumes there are no post-filing taxes owed. Actual tax liabilities may be materially different as tax returns are filed and reassessments occur.
- $\textbf{[5]} \ \textit{Forecast Interest Expenses include interest payable on the Lenders' Pre-Filing Obligations.}$
- [6] Forecast Restructuring Legal and Professional Costs include legal and professional fees associated with the CCAA proceedings and are based on estimates provided by the advisors.
- [7] Represents the portion of the Rifco and Pawnee transaction proceeds held by the Monitor that is used to fund operations by the Company.

# APPENDIX "B" – SUPPLEMENTAL ROSENBERG AFFIDAVIT

(see attached)

Court File No. CV-24-00730212-00CL

# 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 A PLAN OF COMPROMISE OR ARRANGEMENT OF CHESSWOOD GROUP LIMITED, CASE FUNDING INC., CHESSWOOD HOLDINGS LTD., CHESSWOOD US ACQUISITIONCO LTD., LEASE-WIN LIMITED, WINDSET CAPITAL CORPORATION, CHESSWOOD CAPITAL MANAGEMENT INC., CHESSWOOD CAPITAL MANAGEMENT USA INC., 942328 ALBERTA INC., 908696 ALBERTA INC., 1000390232 ONTARIO INC. and CGL HOLDCO, LLC

# AFFIDAVIT OF JEFFREY ROSENBERG (sworn September 25, 2025)

I, Jeffrey Rosenberg, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

- I am a senior managing director of FTI Consulting Canada Inc. ("FTI"), in its capacity as Court-appointed monitor (in such capacity, the "Monitor") in the above-captioned proceedings pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA") and, as such, I have knowledge of the matters to which I hereinafter depose. Unless I indicate to the contrary, the facts herein are within my personal knowledge and are true. Where I have indicated that I have obtained facts from other sources, I believe those facts to be true.
- 2. I make this affidavit in support of a motion by the Monitor for an Order, among other things, approving the fees and disbursements of the Monitor.

- 3. Attached hereto as Exhibit "A" is a redacted copy of the invoice issued by the Monitor for the period between August 1, 2025 and August 31, 2025 (the "Approval Period") setting out the Monitor's fees, disbursements and applicable taxes for the relevant period. I confirm that this account accurately reflects the services provided by the Monitor in this matter for the Approval Period and the fees and disbursements claimed by it for the Approval Period.
- 4. Attached hereto as Exhibit "B" is a schedule of the account rendered by the Monitor for the fees and disbursements incurred in connection with the activities summarized in Exhibit "A" undertaken in these proceedings during the Approval Period.
- 5. Attached hereto as Exhibit "C" is a schedule summarizing the individuals who have worked on this matter, including their roles, hours and billing rates during the Approval Period.
- 6. The total fees charged by the Monitor during the Approval Period were \$282,275.00, plus disbursements of \$35.40, plus Harmonized Sales Tax in the amount of \$36,700.35 for a total of \$319,010.75. Total hours invoiced by the Monitor in this period were 313.70 for an average hourly rate charged of \$899.82/hour.
- 7. To the best of my knowledge, (i) the total hours, fees and disbursements incurred by the Monitor during the Approval Period are reasonable and appropriate in the circumstances, and (ii) the hourly rates charged by the Monitor are comparable to the rates charged by other accounting, financial advisory, and restructuring firms in the Toronto market for the provision of similar services, and are comparable to the hourly rates charged by FTI for services rendered in relation to similar proceedings.

SWORN BEFORE ME over videoconference this 25<sup>th</sup> day of September, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely. The affiant is located in the City of Toronto, in the Province of Ontario and the commissioner is located in the City of Toronto, in the Province of Ontario.

Albina Mamonkina (LSO No. 90473P) Commissioner for Taking Affidavits Jeffrey Rosenberg

Signed by:

# THIS IS EXHIBIT "A" REFERRED TO IN THE AFFIDAVIT OF JEFFREY ROSENBERG SWORN BEFORE ME ON THIS 25TH DAY OF SEPTEMBER 2025

Albina Mamonkina (LSO No. 90473P) A Commissioner for Taking Affidavits

# Exhibit A



# Corporate Finance

September 11, 2025

Chesswood Group Limited 41 Scarsdale Road, Suite 5 Toronto, ON M3B 2R2 Canada

Re: CCAA Monitor Job No. 500001.9490 Invoice No. 102900002747

Enclosed is our invoice for professional services rendered in connection with the above referenced matter. This invoice covers professional fees through August 31, 2025.

Please do not hesitate to call me to discuss this invoice or any other matter.

Sincerely,

Jeffrey Rosenberg Senior Managing Director



#### Invoice Remittance

Chesswood Group Limited 41 Scarsdale Road, Suite 5 Toronto, ON M3B 2R2 Canada Invoice No.
Job No.
Terms
Due Date:
Currency

**Tax Registration:** 

September 11, 2025 102900002747 500001.9490 Due Upon Receipt September 11, 2025 CAD

**Re:CCAA Monitor** 

**Current Invoice Period: Charges posted through August 31, 2025** 

**Amount Due Current Invoice** 

\$319,010.75

**Bank Information** 

to:

Please indicate our invoice number with your remittance

Account Name: Bank Name: Bank Address: FTI Consulting Canada Inc. Bank of Nova Scotia

Scotia Plaza, 44 King Street West

Toronto, Ontario M5H 1H1 Canada Bank Code: 002 Account Number: 0861715 Swift/BIC Code: NOSCCATT

Transit Code: NOSCCA
Account Currency: CAD

Please forward remittance advice to AR.Support@fticonsulting.com.

Please remit cheque payments

FTI Consulting Canada Inc. C/O T10073

P.O. Box 10073 Postal Station A

Toronto, ON M5W 2B1

Canada



## **Invoice Summary**

Chesswood Group Limited 41 Scarsdale Road, Suite 5 Toronto, ON M3B 2R2 Canada Invoice No.
Job No.
Terms
Due Date:
Currency
Tax Registration:

September 11, 2025 102900002747 500001.9490 Due Upon Receipt September 11, 2025 CAD

**Re: CCAA Monitor** 

Current Invoice Period: Charges posted through August 31, 2025

Name	Title	Rate	Hours	Total
Dean Mullett	Senior Managing Director	\$1,280.00	33.40	\$42,752.00
Jeffrey Rosenberg	Senior Managing Director	\$1,280.00	48.00	\$61,440.00
Jodi Porepa	Senior Managing Director	\$1,090.00	64.20	\$69,978.00
Richard Kim	Managing Director	\$1,060.00	44.20	\$46,852.00
Adsaran Vithiyananthan	Director	\$770.00	22.60	\$17,402.00
Jennifer Ye	Consultant	\$435.00	100.20	\$43,587.00
Adam Johnston	Intern	\$240.00	1.10	\$264.00
Total Professional Services			313.70	\$282,275.00
Expenses				Total
Professional Materials				\$35.40
<b>Total Expenses</b>				\$35.40
Invoice Total				CAD Amount
				\$282,310.40
HST (13%)				\$36,700.35
Total Due				\$319,010.75



Invoice No. Job No. September 11, 2025 102900002747 500001.9490

**Total Professional Services Dean Mullett** 

08/01/2025	Various correspondence with same; various discussion regarding with Blakes.	0.70
08/03/2025	Review weekly lender update; various correspondence regarding same.	0.40
08/04/2025	Lender update; various correspondence with Blake regarding same.	0.50
08/05/2025	Various discussions with Osler regarding ; various correspondence with regarding ; Rifco TSA discussions; status and strategy call with Richard Kim regarding	1.20
08/06/2025	Various matters; Rifco post closing matters regarding TSA; various discussions regarding; various correspondence regarding fund flows for charge-offs; calls with Richard Kim regarding	1.60
08/07/2025	Various correspondence regarding ; review of ; calls with Richard Kim regarding same; various correspondence regarding ; review budget variance;	2.80
08/08/2025	Various discussions with Osler regarding  , court dates and Easy Legal; various correspondence regarding; discussion with Richard Kim regarding, lender approvals and court dates; Rifco TSA discussions.	2.60
08/10/2025 08/11/2025	Various discussions regarding lender update deck. Status update and next steps with FTI CA team; review and edit	0.30 4.30
00/11/2023	lender deck regarding ; call with Richard Kim regarding prepare for ; various calls with Jodi Porepa and Richard Kim regarding lender update, etc.; calls with Richard Kim regarding cash flow forecast; various discussions with Osler regarding ; various discussions with Osler regarding ; various discussion regarding .	4.30



		Job No.
08/12/2025	Preparation for and attendance at Lender update call regarding	3.10
	; various discussions with Blakes regarding lender update deck; various discussions with Osler regarding	
	; various discussions with FTI team regarding; various discussions regarding updated cash flow forecasts.	
08/13/2025	Various discussions regarding Waypoint closing matters;	1.40
08/14/2025	various discussions regarding  Weekly budget variance; various discussions regarding	0.90
	; various discussions regarding receipt of ; various discussions regarding pending Waypoint sale closing.	
08/15/2025	Waypoint closing; Bishop and Pawnee closing update; ; various discussions with Blakes regarding lender	2.10
08/18/2025	approval for Status update and work plan with FTI CA team; various discussions regarding; receipt of	1.10
08/19/2025	; discussions with Osler regarding same. Various discussions regarding updated cash flows and lender distribution; various correspondence with Osler regarding same; various calls with Jodi Porepa regarding distribution and banking arrangements; Monitor's certificate regarding North Mill	1.30
08/20/2025	purchase; various discussions regarding	0.40
08/21/2025	Budget variance; correspondence with ; ; ; ; ; review Company draw request; various communications with regarding ; ;	1.00
	various discussions regarding regarding ;	
08/22/2025	Various discussions regarding cash flows and lender distribution; correspondence with Blakes and RBC regarding same.	0.70
08/23/2025	Various discussions regarding lender distribution.	0.20
08/24/2025	Various discussions regarding lender distribution.	0.20
08/25/2025	Status update and work plan for the week with FTI team; call with Richard Kim to discuss lender update and next steps regarding distribution and ; call with FTI team regarding lender distributions and ; various correspondence with FTI team regarding , lender distribution, and upcoming court hearing.	2.20
08/26/2025	Various discussions regarding ; various discussions regarding ; various discussion with Blakes regarding lender update and	1.30

FTI Consulting Canada, Inc.

TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104

**September 11, 2025** 

102900002747

500001.9490

Invoice No.



Invoice Detail		Invoice Job		otember 11, 2025 102900002747 500001.9490
08/27/2025	Various correspondence with Blakes re- various discussions with FTI team regardiscussion regarding		0.50	
08/28/2025	Various discussions regarding budget to various discussions regarding Waypoint various discussions regarding Rifco	-	1.00	
08/29/2025	Review proposed emails regarding same; various discussi	; various ons regarding customs regarding Rifco	0.80	
08/30/2025	Various discussions with FTI team regatiming.	rding lenders, distribution,	0.80	
	\$1,280.00	per hour x total hrs	33.40	\$42,752.00

#### **Jeffrey Rosenberg**

08/01/2025	Work on work on bank account matters; update call on various matters; work on matters.	2.70
08/04/2025	Work on update to lenders; work on	1.20
08/05/2025	Work on treview files regarding same; work on file closing matters.	2.20
08/06/2025	Work on ; work on ; work on ; review of week reporting.	3.40
08/07/2025	Review of ; review of ; review of appraisals. ; review of appraisals.	3.30
08/08/2025	Work on banking matters; ; ; ; ; ; work on closing of transaction.	2.40
08/11/2025	Review of presentation to lenders; review of weekly reporting.	2.20
08/12/2025	Review of correspondence; file update.	1.40
08/13/2025	Review of correspondence; review of	1.60
08/14/2025	Work on closing matters and court documents; review of U.S. recognition order; ; review of weekly reporting.	1.80
08/15/2025	Work on Waypoint matters; review of correspondence; update matters.	1.70
08/18/2025	Sign closing documents; correspondence with Osler.	2.30
08/19/2025	Review of cash flow and distributions.	1.60
08/20/2025	Review of correspondence; review of financial matters; review of Easy Legal matters; update on Waypoint; review of weekly reporting.	2.20

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Toronto, ON M5K1G8 Canada



Invoice Detail		Invoice No. Job No.	S	eptember 11, 2025 102900002747 500001.9490
08/21/2025	Work on accounting matters; work on	; work on	2.30	
	; review of payments; review of w	eekly reporting.		
08/22/2025	Review of correspondence; review of files; re	view of distribution	1.60	
	matters; work on .			
08/23/2025	Review of financial matters; review of reserve	es.	0.80	
08/24/2025	Review of various emails regarding		0.70	
08/25/2025	Attend update call; review of correspondence:	review of update to	1.40	
	lenders; review of correspondence from legal	counsel.		
08/26/2025	Review of disbursements; work on correspondence from legal counsel.	; review of	2.30	
08/27/2025	Review of correspondence; review of disburse	ements.	2.50	
08/28/2025	Review of correspondence; review of disburse	ements; work on	2.30	
	; review of weekly reporting.			
08/29/2025	Call with respect to	; review of	2.70	
	payments; review of cash flow forecast; review	w of		
	·			
08/31/2025	Work on cash flow; review of correspondence	·.	1.40	
	\$1,280.00	per hour x total hrs	48.00	\$61,440.00

#### Jodi Porepa

08/01/2025	Internal discussion regarding proceeds from ; call with Osler to discuss ; review responses	4.60
	provided by US counsel on ; review and follow up on	
	; review and follow up on ; review updated	
	; draft response to Blakes regarding	
	; follow up on underlying support for US and	
	Canadian entities.	
08/05/2025	Review final correspondence and finalize next steps;	4.00
	weekly touchpoint with CEO and discuss next steps to	
	; follow up with counsel on ; update on	
	; review and respond to Rifco	
	; review and draft response on	
08/06/2025	Review variance analysis; review ;	5.10
	call with counsel to discuss; follow up with ; review	
	outstanding items as part of ;	
	review and respond to email enquiries; internal discussions	
	regarding same; call with counsel to discuss	
	; follow up on .	

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	Jol	b No.
08/07/2025	Review proposed disbursements and provide comments; call with insurers, Osler and Alston to discuss ; review and finalize variance analysis; review and finalize communication with the ; review and finalize correspondence regarding ; review financial reconciliations; review communication and provide comments.	5.20
08/08/2025	Review ; internal discussion regarding same; review and approve disbursements.	1.50
08/11/2025	Call to finalize Waypoint transition; finalize response regarding; internal discussions regarding same; internal call to discuss; review and provide comments for review updated cash flow forecast and provide comments; call with counsel regarding.	6.90
08/12/2025	Status update call with lenders; internal discussions regarding ; follow up on ; follow up on ; review and respond to ; call with US counsel to confirm next steps and estimated timing; review remaining transition steps for Waypoint; internal discussions regarding same.	4.40
08/13/2025	Call with Osler regarding ; internal discussions regarding same; review updated financial analysis; call with Alston to discuss ; review updated ; internal discussion regarding same; review variance analysis and provide comments; review proposed payments and provide comments; review financial analysis.	4.70
08/15/2025	Review final list of proposed payments; review ; review ; review US court materials; update on ; follow up on outstanding Waypoint transition items; follow up on outstanding items needed to close; review updated inventory of books and records; internal discussion regarding same.	3.80
08/18/2025	Review financial analyses; call with US counsel from Blakes and Alston LLP to address; post-call discussion with Alston; call with CEO to discuss; internal discussion regarding; review proposed disbursements and provide comments.	2.50

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TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

**September 11, 2025** 

102900002747

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Invoice No.



		Job No.
00/10/2025	D :	2.20
08/19/2025	Review status of discussions with ; internal discussions regarding same; internal	2.30
	discussion regarding ; review draft email	
	and provide comments in respect of same; internal discussions on	
	Waypoint transition items; review and respond to outstanding	
	items; general CCAA considerations.	
08/20/2025	Review variance analysis and provide comments; review	2.60
	proposed disbursements and provide comments; review financial	
	analysis; discuss preparation regarding for next court hearing;	
	internal discussion on ; review status of	
	Waypoint transition items and discuss next steps.	
08/21/2025	Review draft ; discussion regarding	2.50
	upcoming court hearing and approval required; discussion with	
	counsel on ; discussion with CEO on	
	; follow up on status of ; review	
	financial reconciliation; review; review; review	
	updated cash flow forecast; review draft language for	
00/00/0005	; review and respond to lender enquiries.	2.10
08/22/2025	Update on ; follow up on outstanding	2.10
	enquiries; internal discussion on outstanding ; review	
08/25/2025	updated financial analysis and provide comments.	3.30
06/23/2023	Internal call regarding distributions to lenders; follow up with counsel; discussion with CEO regarding	3.30
	; review draft communication and provide comments; follow	
	up on ; internal discussion regarding	
	; preparation for upcoming court hearing.	
08/26/2025	Internal call regarding distributions to lenders; follow up with	1.50
	counsel; discussion with CEO regarding	-10 0
	; review draft communication and provide comments; follow	
	up on ; internal discussion regarding	
	; preparation for upcoming court hearing.	
08/27/2025	Call with Osler to discuss ; call with	2.30
	; review variance analysis and	
	provide comments; review correspondence on	
	; review and provide comments; internal	
	discussions regarding same.	
08/28/2025	Review proposed disbursements and approve; finalize variance	3.40
	analysis; respond to third party enquiries; review updated	
	assumptions for cash flow forecast; review financial analysis;	
	internal discussions regarding ; follow up on	
	outstanding ; review and respond	
	to ; review and respond to counsel; review and	
	respond to professional invoices received.	

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**September 11, 2025** 

102900002747 500001.9490

Invoice No.



Invoice No. Job No. September 11, 2025 102900002747 500001.9490

08/29/2025 Call with counsel to discuss ; review 1.50

; internal discussions

regarding same.

\$1,090.00 per hour x total hrs 64.20 \$69,978.00

#### **Richard Kim**

08/01/2025	Review of comments to and discussions with counsel on the same.	3.80
08/03/2025	Update to lenders.	0.50
08/05/2025	Call with and counsel on	2.50
	; review of latest financial information.	
08/06/2025	Discussion with counsel on	2.00
	; review of	
08/07/2025	Review of latest financial information; discussion on	3.00
08/08/2025	Review of cash flow forecast; transition items for closing; review	2.00
	of financial information	
08/10/2025	Lender update presentation and review of related information.	2.00
08/11/2025	Lender update presentation and review of related information;	5.00
	review of cash flow forecast.	
08/12/2025	Presentation with lenders; review of and	2.00
	financial information.	
08/13/2025	Preparation for closing and review of	2.00
08/14/2025	review and transition considerations	2.00
	for closing.	
08/15/2025	Coordination of closing matters for multiple transactions with	3.80
	counsel.	
08/18/2025	Coordination of closing matters for multiple transactions with	1.50
	counsel.	
08/19/2025	Review of and related contract and	1.20
	financial information.	
08/20/2025	Comments to .	1.00
08/21/2025	Correspondence with counsel and internal team on	1.10
08/22/2025	Coordination of execution of	1.00
08/25/2025	Review of cash flow materials for purposes of distribution;	1.00
	discussions on the same.	
08/26/2025	Coordination of ; review of	2.00
	latest financial information on .	

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Toronto, ON M5K1G8 Canada



Invoice Detail		Invoid Jo		September 11, 2025 102900002747 500001.9490
08/27/2025	Review of ;	coordinating	1.00	
	t.			
08/28/2025	Review of information for distri	bution and .	1.80	
08/29/2025	Review of	and planning for transition on	2.00	
	closing.			
	\$1,060.00	per hour x total hrs	44.20	\$46,852.00

#### Adsaran Vithiyananthan

08/01/2025	Review listing of entities; review workbook; internal	0.60
	discussions.	
08/05/2025	Call on ; discussion on ;	1.40
	update listing of entities; internal discussions on	
08/07/2025	Discussion on .	0.80
08/08/2025	Correspondence on ; internal discussions; review and	0.80
	update .	
08/11/2025	Revise and update cash flow forecast; walk through of potential	3.90
	proceeds available for distribution; update entity listing for taxes;	
	call on cash flows and entity listing; internal discussions;	
	discussion on	
08/12/2025	Updating entity listings; call on ; internal	0.90
	discussions on .	
08/14/2025	Discussions on .	0.30
08/18/2025	Correspondence on distribution matters; update cash flows.	0.60
08/19/2025	Further updates to cash flow forecast and expected distributions;	1.40
	internal discussions on current ongoing tasks,	
	and outstanding items.	
08/20/2025	Work on ; call on ;	1.60
	internal discussions.	
08/21/2025	Internal discussions on ; review checklist.	0.70
08/22/2025	Correspondence on ; correspondence on lender	0.70
	distributions.	
08/25/2025	Review and update cash flow forecast; review	1.90
	and update the same; internal discussions on	
08/26/2025	Work on ; review ;	2.10
	internal discussions on proposed distribution.	
08/27/2025	Review; internal discussions on	1.70
	; discussions on ; review cash	
	flow.	

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104



Invoice Detail		Invoice No. Job No.		September 11, 2025 102900002747 500001.9490
08/28/2025	Review ; internal discussions on cash flow forecast; review and	1	2.50	
08/29/2025	update cash flow forecast.  Correspondence on ; various internal discussions.		0.70	

per hour x total hrs

22.60

\$17,402.00

\$770.00

#### Jennifer Ye

08/01/2025	Review ;	3.30
	follow up on outstanding items; internal call to discuss funds to	
	be received and ; discussion regarding	
	; review of support provided by Company; email	
	correspondence with Company regarding	
08/05/2025	Review ; update ; review	5.70
	outstanding update Company to-do	
	list; call regarding the same; various correspondence regarding	
	outstanding items; update wire instructions for receipt of	
08/06/2025	Variance analysis for the Week Ending August 1, 2025; update	6.80
	bank account and reserve trackers; call with Company;	
	follow up on outstanding items; internal call regarding the same;	
	call with Osler; call to ; call with Company;	
	review of requests; review of	
	proposed payments for the Week Ending August 8, 2025; follow	
	up regarding the same; call with Alston; review of bank accounts	
	and trial balance.	
08/07/2025	Call with Company; call with Company	5.40
	regarding and proposed payments; review of support	
	regarding the same; internal call for review and approval of	
	proposed payments; reconcile ; set up	
	wires for transfer of funds; various correspondence regarding	
	; calls to bank regarding wires.	
08/08/2025	Follow up on outstanding items; update wire instructions for	3.30
	; various discussions regarding	
	; review of draft ; follow up on wire to Rifco;	

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TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada



	Jo	ob No.
08/11/2025	Update professional fees paid to date summary for cash flow forecasting; review and approve Chesswood, Easy Legal and Waypoint payrolls for the Week Ending August 15, 2025; calls regarding cash flow forecast; call with Company to review to-do list; call with Waypoint regarding transition; review variance analysis for the Week Ended August 8, 2025; review of internal call to discuss outstanding items;	4.90
08/12/2025	Review of Easy Legal funds transfer request; correspondence regarding the same; review of type to the creditor listing for stayed amounts; call to vendor counsel regarding the same transfer request; correspondence regarding the same; review of the creditor listing for stayed amounts; call to vendor counsel regarding the same transfer request; correspondence regarding the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same; review of the same transfer request; correspondence regarding the same transfer request; correspondence regarding the same transfer request; correspondence regarding the same transfer request reques	2.80
08/13/2025	Review of variance analysis; review of proposed payments for the Week Ending August 15, 2025; request for support regarding the same; review language for proposed; update billing summary for court report; internal call to discuss outstanding items; call with Company to review variance analysis; approve proposed payments; call with bank; review of	7.00
08/14/2025	Call to Company regarding outstanding pre-filing creditors; finalize variance analysis for lender review; update physical data workbook; follow up on outstanding items; review of ; update billing summary for court report; prepare and send wire details for Waypoint transaction.	4.50
08/15/2025	Prepare internal transition of to-do items; internal call to discuss the same; review of bank accounts for receipt of Waypoint funds; emails regarding the same; call to Company regarding cash sweep; call regarding ; update Monitor's website with Monitor's certificate.	4.50
08/18/2025	Update list for outstanding items; call with Company regarding the same; review; call to vendor regarding; review of bank account balances; various follow up on outstanding items.	3.90
08/19/2025	Update physical data workbook for vendor; call to ; follow up on outstanding items; call to Company regarding the same; update Monitor's website for Monitor's Certificate.	3.80
08/20/2025	Update ; work on physical data workbook; review of variance analysis for the Week Ending August 15, 2025; email to ; internal call regarding data retention and outstanding items; call regarding ; call with Company to review variance analysis; follow up on ; finalize .	6.20

FTI Consulting Canada, Inc.
TD South Tower, 79 Wellington Street West, Suite 2010, P.O. Box 104
Toronto, ON M5K1G8 Canada

**September 11, 2025** 

102900002747 500001.9490

Invoice No.



#### **September 11, 2025** Invoice Detail Invoice No. 102900002747 500001.9490 Job No. 08/21/2025 Update ■ 5.80 ; send ; finalize variance analysis for lender review; follow up on various outstanding items; call to Landlord; prepare Word documents for various correspondence regarding ; draft language for replying to vendors. 08/22/2025 Various follow up on outstanding items; complete TR forms for 3.40 July; call with counsel; call to Landlord; review and Order language for distribution of proceeds; various correspondence regarding landlord; email to 08/25/2025 Update Company outstanding items list; call to discuss the same; 4.40 prepare ; call with Osler; follow up on outstanding items; correspondence with 7.50 08/26/2025 Review of Chesswood and Easy Legal payroll; approval regarding the same; update of repayment notice; update creditor listing; follow up on ; draft repayment language; update tax workbook; review of variance; review of variance analysis; various correspondence with Company and counsel ; call with Company regarding variance regarding analysis. 6.20 08/27/2025 **Update** ; update ; correspondence with Company regarding ; update Company to-do list; review of variance analysis; review Rifco ; call with call with Company to review variance analysis; call with Company regarding entities with contracts; call with ; summary of reach-out efforts to landlord. 08/28/2025 **Update** ; reconciliation of 7.30 ; internal call regarding outstanding items; call regarding cash flow forecast; follow up on outstanding items; review ; finalize variance analysis for lender review. 08/29/2025 Call with counsel; update repayment language; follow up on 3.50 questions to Easy Legal regarding creditors; review proposed payments for the Week Ending August 29, 2025; review creditor listing; update ; review ; approve payment of certain AP.

#### **Adam Johnston**

per hour x total hrs

\$435.00

\$43,587.00

100.20



Invoice No. Job No.

1.10

**September 11, 2025** 102900002747 500001.9490

08/01/2025 Updated vendor tracking list based on new vendor information

received.

\$240.00 1.10 \$264.00 per hour x total hrs

> **Total Professional Services CAD** \$282,275.00

# THIS IS EXHIBIT "B" REFERRED TO IN THE AFFIDAVIT OF JEFFREY ROSENBERG SWORN BEFORE ME ON THIS 25TH DAY OF SEPTEMBER 2025

Albina Mamonkina (LSO No. 90473P) A Commissioner for Taking Affidavits

# **EXHIBIT B**

Invoice No./Period	Invoice Date	Fees (\$)	Expenses (\$)	HST (\$)	Total Fees, Disbursements,	Hours	Average Billed
					and HST (\$)	Billed	Rate (\$)
102900002747	9/11/2025	282,275.00	35.40	36,700.35	319,010.75	313.70	899.82
(August 1, 2025 - August 31, 2025)							
Total		282,275.00	35.40	36,700.35	319,010.75	313.70	899.82

# THIS IS EXHIBIT "C" REFERRED TO IN THE AFFIDAVIT OF JEFFREY ROSENBERG SWORN BEFORE ME ON THIS 25TH DAY OF SEPTEMBER 2025

Albina Mamonkina (LSO No. 90473P) A Commissioner for Taking Affidavits

# **EXHIBIT C**

August 1, 2025 - August 31, 2025							
Name Title Hourly Rate (\$)				Total Billed (\$)			
Dean Mullett	Senior Managing Director	1,280.00	33.40	42,752.00			
Jeffrey Rosenberg	Senior Managing Director	1,280.00	48.00	61,440.00			
Jodi Porepa	Senior Managing Director	1,090.00	64.20	69,978.00			
Richard Kim	Managing Director	1,060.00	44.20	46,852.00			
Adsaran Vithiyananthan	Director	770.00	22.60	17,402.00			
Jennifer Ye	Consultant	435.00	100.20	43,587.00			
Adam Johnston	Intern	240.00	1.10	264.00			
Total	313.70	282,275.00					

Court File No.: CV-24-00730212-00CL

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C. 1985, c. C-36, AS AMENDED AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF CHESSWOOD GROUP LIMITED, et al.

# ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

Proceeding Commenced at Toronto

# AFFIDAVIT OF JEFFREY ROSENBERG (sworn September 25, 2025)

#### OSLER, HOSKIN & HARCOURT LLP

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Lawyers for the Monitor