

**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
FIGR BRANDS, INC., FIGR NORFOLK INC.
AND CANADA'S ISLAND GARDEN INC.**

Applicants

**FACTUM OF THE APPLICANTS
(Employee Claims Procedure Order and Stay Extension and Fee Approval Order)**

April 27, 2021

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FACTUM OF THE APPLICANT

PART I: OVERVIEW

1. FIGR Brands, Inc. ("**FIGR Brands**"), FIGR Norfolk Inc. ("**FIGR Norfolk**"), and Canada's Island Garden Inc. ("**CIG**", and together with FIGR Brands and FIGR Norfolk, the "**Applicants**" or the "**FIGR Group**") are seeking, under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"):

- (a) an order (the "**Employee Claims Procedure Order**"), among other things, establishing a process for the identification, determination and adjudication of Employee Claims (as defined in the Employee Claims Procedure Order) against the FIGR Group and their current and former Directors and Officers (each as defined in the Employee Claims Procedure Order) (the "**Employee Claims Procedure**"); and
- (b) an order (the "**Stay Extension and Fee Approval Order**"), among other things:
 - (i) abridging the time for service of the motion record returnable April 30, 2021 and dispensing with service on any person other than those served;
 - (ii) extending the Stay Period (as defined below) until and including June 30, 2021;
 - (iii) approving the Fourth Report of the Monitor (as defined below) dated April 27, 2021 (the "**Fourth Report**"), and the activities described therein; and
 - (iv) approving the fees and disbursements of the Monitor and its counsel as set out in the fee affidavits included in the Fourth Report.

PART II: FACTS

2. The facts underlying this motion are more fully set out in the affidavit of Michael Devon sworn April 23, 2021 (the "**April 23 Affidavit**") and the Fourth Report.¹ All capitalized terms used but not defined herein have the meanings ascribed to them in the April 23 Affidavit.

A. Background to the Need for CCAA Protection and the Granting of the Initial Order

3. The FIGR Group operates two (2) licensed cannabis facilities – one in Simcoe, Ontario and the other in Charlottetown, Prince Edward Island. Since commencing operations, both facilities have been cash flow negative and the FIGR Group has been dependent on certain of their affiliate companies for funding.²

4. Facing significant liquidity issues, potential enforcement action from certain of its creditors and the cessation of business, the FIGR Group sought protection under the CCAA. To that end, on January 21, 2021, the Applicants sought and obtained the initial order (the "**Initial Order**").³

5. Among other things, the Initial Order:

- (a) granted a stay of proceedings until January 31, 2021 (the "**Stay Period**");
- (b) appointed FTI Consulting Canada Inc. as monitor of the Applicants (in such capacity, the "**Monitor**");
- (c) approved the Applicants' ability to borrow under a debtor-in-possession credit facility (the "**DIP Loan**"); and

¹ Affidavit of Michael Devon sworn April 23, 2021 [April 23 Affidavit]; Fourth Report of the Monitor dated April 27, 2021 [Fourth Report].

² April 23 Affidavit, *ibid* at para 5.

³ April 23 Affidavit, *ibid* at para 6; Fourth Report, *supra* note 1 at para 1.

(d) granted the following charges (collectively, the "**Charges**") over the Applicants' Property: (i) the Administration Charge up to a maximum amount of \$600,000; (ii) the Directors' Charge up to a maximum amount of \$2,000,000; (iii) the DIP Lender's Charge up to a maximum amount of \$2,500,000; and (iv) the Intercompany Charge.⁴

6. On January 29, 2021, the Applicants obtained an amended and restated initial order which, among other things:

- (a) elevated the priority of the Charges ahead of all Encumbrances;
- (b) increased the Directors' Charge and the DIP Lender's Charge to the maximum amounts of \$2,700,000 and \$8,000,000 (plus interest and costs), respectively; and
- (c) extended the Stay Period to and including March 31, 2021.⁵

7. On January 29, 2021, the Applicants also sought and obtained an order (the "**SISP Approval Order**") approving a sale and investor solicitation process (the "**SISP**").⁶

8. On February 22, 2021, the Court granted an order (the "**Claims Procedure Order**") which, among other things, approved a process for the solicitation, identification, determination and adjudication of claims against the FIGR Group and their present and former Directors and Officers (the "**Claims Procedure**"). The Claims Procedure explicitly excluded Employee Claims.⁷

9. On February 22, 2021, the Court also granted an order (the "**Ancillary Order**") which, among other things, approved a key employee retention plan, extended the Stay Period until April 30, 2021 and approved the fees and expenses of the Monitor and its counsel, Cassels Brock & Blackwell LLP

⁴ April 23 Affidavit, *ibid* at para 7; Fourth Report, *ibid* at para 2.

⁵ April 23 Affidavit, *ibid* at para 8; Fourth Report, *ibid* at para 3(a).

⁶ April 23 Affidavit, *ibid* at para 10; Fourth Report, *ibid* at para 3(b).

⁷ April 23 Affidavit, *ibid* at para 11; Fourth Report, *ibid* at para 4(a).

("Cassels"), for the periods from January 21, 2021 to February 7, 2021 and January 22, 2021 to February 12, 2021, respectively.⁸

10. On March 31, 2021, the Court granted an order (the "**DIP Amendment Order**") which, among other things, authorized the execution by the Applicants of the first amendment to the DIP Commitment Letter. Among other things, the DIP Commitment Letter increased the maximum borrowing available under the DIP Loan up to \$13,000,000 (which was an increase of \$5,000,000). The DIP Amendment Order also authorized a corresponding increase to the DIP Lender's Charge and approved the fees and expenses of the Monitor and Cassels for the periods from February 7, 2021 to March 14, 2021 and February 13, 2021 to March 14, 2021, respectively.⁹

B. The Applicants' Activities Since the Granting of the DIP Amendment Order and an Update on the SISP

11. The Applicants, with the oversight of the Monitor, have continued to operate their business in the ordinary course since the granting of the DIP Amendment Order. Additionally, the Applicants have continued to act in good faith and with due diligence to, among other things, stabilize their business, communicate, with the assistance of the Monitor, with Health Canada, employees, customers (including the provincial cannabis boards), suppliers and other key stakeholders in the CCAA Proceedings and assist the Monitor with the SISP and the Claims Procedure.¹⁰

12. The Monitor, together with its affiliate FTI Capital Advisors – Canada ULC and the Applicants, has taken steps to advance the SISP in accordance with the timeline set out in the SISP. Following the distribution of the Bid Process Letter to all Phase 2 Qualified Bidders, the Monitor, with the assistance of the FIGR Group, has been reviewing all Phase 2 Qualified Bids and corresponding with the

⁸ April 23 Affidavit, *ibid* at para 12; Fourth Report, *ibid* at para 4(b).

⁹ April 23 Affidavit, *ibid* at para 13; Fourth Report, *ibid* at para 5.

¹⁰ April 23 Affidavit, *ibid* at para 14.

appropriate Phase 2 Qualified Bidders in an attempt advance the Phase 2 Qualified Bids into one or more closable transactions.¹¹

13. The Monitor continues to advance the SISP in accordance with the SISP Approval Order.¹²

C. The Employee Claims Procedure Order

14. The Applicants are seeking approval of the Employee Claims Procedure Order and authorization to undertake the Employee Claims Procedure to identify, determine and adjudicate Employee Claims against the FIGR Group and their present and former Directors and Officers. Employee Claims were expressly excluded from the Claims Procedure Order granted previously in the CCAA Proceedings.¹³

15. A detailed description of the Employee Claims Procedure Order is provided in the April 23 Affidavit. The key features of the Employee Claims Procedure are summarized below.

The Employee Claims Procedure

16. The Employee Claims Procedure contemplates that the Monitor, in consultation with the Applicants, shall deliver an Employee Claims Package containing, among other things, an Employee Claim Statement and a Notice of Dispute of Employee Claim Statement to any Employee with a Claim for vacation pay, termination pay, severance pay, wages, expenses, commissions, or other remuneration, arising as a result of the termination of employment or a layoff of such Employee by any Applicant prior to or during the CCAA Proceedings. The Employee Claim Statement will include an assessment of the quantum of such Employee's Claim based on the books and records of the FIGR Group and will advise as to certain of the Employee's rights and obligations.¹⁴

¹¹ April 23 Affidavit, *ibid* at paras 15 and 16; Fourth Report, *supra* note 1 at para 14 and paras 16 and 17.

¹² April 23 Affidavit, *ibid* at para 17; Fourth Report, *ibid* at paras 16 and 17.

¹³ April 23 Affidavit, *ibid* at paras 18 and 19; Fourth Report, *ibid* at para 20.

¹⁴ April 23 Affidavit, *ibid* at para 20; Fourth Report, *ibid* at paras 23 and 24.

17. The Employee Claims Package will be sent to each Employee with an Employee Claim by ordinary mail or electronic mail to the last known address or email address of the Employee, as applicable, within:

- (a) ten (10) Business Days following the date that the proposed Employee Claims Procedure is granted if such Employee's employment with the FIGR Group was terminated prior to or on the date of the Employee Claims Procedure Order; or
- (b) ten (10) Business Days following the date on which an Employee's employment with the FIGR Group is terminated or an Employee's temporary layoff ceases to be temporary under the *Employment Standards Act, 2000*, S.O. 2000, c. 41, as amended (the "ESA") (or similar applicable provincial statute), if this occurs following the date of the Employee Claims Procedure Order.¹⁵

18. The amounts set forth in an Employee Claim Statement will be calculated based on such Employee's contractual entitlement, if applicable. Should an Employee not have a written employment contract or should the employment contract be silent on any such entitlement, the amount set forth in the Employee Claim Statement will be calculated based on the statutory minimum under the ESA (or similar applicable provincial statute).¹⁶

19. Should an Employee disagree with the assessment of his or her Employee Claim as set out in its Employee Claim Statement, such Employee must complete and return to the Monitor, prior to 5:00 p.m. (Toronto time) on the date that is thirty (30) Calendar Days after the date on which the Monitor sends an Employee Claims Package to an Employee having an Employee Claim, a completed Notice of Dispute

¹⁵ April 23 Affidavit, *ibid* at para 21; Fourth Report, *ibid* at para 22.

¹⁶ April 23 Affidavit, *ibid* at para 22; Fourth Report, *ibid* at para 24.

of Employee Claim Statement asserting a claim in a different amount supported by the appropriate documentation.¹⁷

20. The Monitor shall, should it receive an Employee's Notice of Dispute of Employee Claim Statement on or before the Employee Claims Bar Date, review such Notice of Dispute of Employee Claim Statement, in consultation with the FIGR Group. If the Monitor disagrees with the amount of the Employee Claim as set out in the Notice of Dispute of Employee Claim Statement it shall, in consultation with the FIGR Group, attempt to resolve such dispute and settle the purported Employee Claim. Should such a resolution or settlement not be possible, or not be within a time period or manner satisfactory to the Monitor, the Monitor shall, in consultation with the FIGR Group, refer such dispute to a Claims Officer or the Court for adjudication at its election. The Monitor shall forthwith provide written notice to the Employee notifying him or her of the Monitor's election.¹⁸

21. Should a Notice of Dispute of Employee Claim Statement not be received by the Employee Claims Bar Date, the Employee's claim will be deemed to be as set out in such Employee's Employee Claim Statement.¹⁹

22. The proposed Employee Claims Procedure is the most expeditious and efficient method of identifying and resolving the Employee Claims and is flexible, fair and appropriate in the circumstances. The Monitor is supportive of the Employee Claims Procedure as set out in the proposed Employee Claims Procedure Order.²⁰

D. The Stay Extension and Fee Approval Order

The Stay Extension

¹⁷ April 23 Affidavit, *ibid* at para 23; Fourth Report, *ibid* at paras 25 and 26.

¹⁸ April 23 Affidavit, *ibid* at para 24; Fourth Report, *ibid* at para 29.

¹⁹ April 23 Affidavit, *ibid* at para 25; Fourth Report, *ibid* at para 30.

²⁰ April 23 Affidavit, *ibid* at para 27; Fourth Report, *ibid* at para 32.

23. Pursuant to the Ancillary Order, the Court extended the Stay Period until and including April 30, 2021. Pursuant to the Stay Extension and Fee Approval Order, the Applicants are seeking to extend the Stay Period until and including June 30, 2021.²¹

24. It is necessary and in the best interest of the Applicants and their stakeholders that the Stay Period be extended as it will allow the Monitor, with the assistance of the Applicants, to:

- (a) advance the Employee Claims Procedure, should it be approved;
- (b) complete the SISP and seek any necessary Court approvals;
- (c) advance and complete the Claims Procedure and the Employee Claims Procedure in accordance with the Claims Procedure Order and the proposed Employee Claims Procedure Order; and
- (d) continue to advance matters toward making distributions of sale proceeds to the DIP Lender and other creditors of the FIGR Group.²²

25. The Applicants are projected to have sufficient liquidity to fund their obligations and the costs of the CCAA Proceedings through the end of the extended Stay Period.²³

PART III: ISSUES

26. The issues to be considered on this motion are whether:

- (a) this Court should grant the Employee Claims Procedure Order; and
- (b) this Court should extend the Stay Period.

²¹ April 23 Affidavit, *ibid* at para 29; Fourth Report, *ibid* at paras 38 and 39.

²² April 23 Affidavit, *ibid* at para 30; Fourth Report, *ibid* at para 39.

²³ April 23 Affidavit, *ibid* at para 31; Fourth Report, *ibid* at para 40.

A. The Claims Procedure Order Should be Granted

27. Section 11 of the CCAA authorizes this Court to make "any order it considers appropriate in the circumstances",²⁴ including an order approving a process for the solicitation and determination of claims against a debtor company and its directors and officers. As this Court recognized in *Re Toys "R" Us (Canada) Ltd.*, such orders are routinely granted.²⁵ And as noted above, this Court has already granted a claims procedure order in this proceeding.

28. Claims procedure orders permit insolvent debtors to establish processes "under which all of the creditors of an applicant and its directors and officers can submit their claims for recognition and valuation".²⁶ Generally, such processes involve:

- (a) a method to communicate to potential creditors that there is a process by which they must prove their claims and the date by which they must do so;
- (b) an opportunity for the debtor or its representative to review and, if appropriate, contest claims made by creditors;
- (c) an adjudication mechanism for claims that cannot be agreed upon or settled through negotiation;
- (d) a "claims bar date" by which claims must be submitted; and
- (e) the barring of late claims to ensure that the Court-appointed monitor and the applicant can make accurate and informed determinations for voting and distribution purposes.²⁷

²⁴ *Companies' Creditors Arrangement Act*, RSC 1985, c. C-35 s 11 [CCAA].

²⁵ *Re Toys "R" Us (Canada) Ltd.*, 2018 ONSC 609 at para 8.

²⁶ *Ibid.*

²⁷ *Ibid.*; *Timminco Ltd. Re.*, 2014 ONSC 3393 at para 43.

29. These processes have been regarded by courts as eminently practical means of streamlining and resolving the "multitude of claims against an insolvent debtor" in a timely and cost effective manner.²⁸

30. As previously noted, the Court has already granted the Claims Procedure Order, which called for all creditors of the FIGR Group and the Directors and Officers to submit their Claims, with the exception of Employee Claims.²⁹ The FIGR Group, in an effort to eventually make distributions to unsecured creditors and ultimately bring these CCAA Proceedings to an end, is now in a position to call for Employee Claims. In light of timing and the current status of the CCAA Proceedings, the factors that support this Court's exercise of discretion to approve the Employee Claims Procedure set out in the proposed Employee Claims Procedure Order are as follows:

- (a) the Employee Claims Procedure is necessary to identify and determine the universe of Employee Claims that may exist against the Applicants and their Directors and Officers, evaluate the impact of such Employee Claims and enable the Applicants to potentially make distributions to unsecured creditors following the SISP;
- (b) it is necessary to understand the scope and nature of any potential Employee Claims against the Directors and Officers in order to be able to identify and address any indemnity claims the Director and Officers might have against the Applicants;
- (c) the Employee Claims Procedure has been developed with the assistance and oversight of the Monitor and its counsel, and the Monitor will be primarily responsible for conducting the Employee Claims Procedure;

²⁸ [ScoZinc Ltd. Re, 2009 NSSC 136](#) at para 31; [Canwest Global Communications Corp. Re, 2011 ONSC 2215](#) at para 40.

²⁹ April 23 Affidavit, *supra* note 1 at para 11; Fourth Report, *supra* note 1 at para 20.

- (d) the Employee Claims Procedure has been designed to be a flexible, fair, expeditious, and comprehensive means of identifying and resolving all Employee Claims against the Applicants and their Directors and Officers;
- (e) the Employee Claims Procedure Order provides terminated Employees with sufficient opportunity to review the Employee Claims Package and to submit a Notice of Dispute of Employee Claim Statement should they wish to dispute the quantum of their Employee Claim as set out in their Employee Claim Statement;
- (f) there is a fair and streamlined process for resolving all disputed Employee Claims in a time-sensitive and cost-efficient manner, and in the event that the Monitor, in consultation with the Applicants, is unable to resolve a dispute regarding any Employee Claim, such Employee Claim shall be referred to the Court or Claims Officer for resolution; and
- (g) the Monitor is supportive of the granting of the Employee Claims Procedure Order and believes that the Employee Claims Procedure is appropriate in the circumstances and in the best interests of the FIGR Group and all of its stakeholders.³⁰

31. For these reasons, the proposed Employee Claims Procedure accords with the Court's discretion under the CCAA. It is flexible, expeditious and procedurally fair, ensuring an efficient identification and resolution of Employee Claims against the Applicants. The Applicants submit that the Employee Claims Procedure will streamline the resolution of claims against the Applicants in the most time-sensitive and cost-efficient manner and is appropriate in the circumstances.

³⁰ April 23 Affidavit, *ibid* at paras 18-28; Fourth Report, *ibid* at paras 20 and 32.

B. The Stay Period Should be Extended

32. The Stay of Proceedings currently expires on April 30, 2021.³¹

33. Section 11.02(2) of the CCAA gives this Court the authority to grant an extension of the Stay of Proceedings for any period it "considers necessary".³² To do so, this Court must be satisfied that circumstances exist that make the order appropriate and that the Applicants have acted, and are acting, in good faith and with due diligence.³³

34. A stay of proceedings is appropriate where it provides the debtors with breathing room while they seek to restore their solvency and emerge from their restructuring on a going concern basis.³⁴ Further, a stay of proceedings will be appropriate where it advances the purposes of the CCAA – including avoiding the social and economic effects of bankruptcy.³⁵

35. As detailed in the April 23 Affidavit and the Fourth Report, the Applicants require the extension to the Stay Period to, among other things:

- (a) allow the Monitor, with the assistance of the FIGR Group, to advance the Employee Claims Process, should it be approved;
- (b) allow the Monitor, with the assistance of the Applicants, to complete the SISP;
- (c) provide the Applicants with an opportunity to seek Court approvals of the transaction(s) resulting from the SISP;
- (d) allow the Monitor, with the assistance of the FIGR Group, to advance and complete the Claims Procedure in accordance with the Claims Procedure Order; and

³¹ April 23 Affidavit, *ibid* at para 29; Fourth Report, *ibid* at para 38.

³² [CCAA](#), *supra* note 24 s 11.02(2).

³³ *Ibid*.

³⁴ [Century Services Inc v Attorney General \(Canada\)](#), 2010 SCC 60 at para 14 [*Century Services*]; [Target Canada Co](#), 2015 ONSC 303 at para 8.

³⁵ [Century Services](#), *ibid* at para 70.

- (e) continue to advance matters toward making distributions of sale proceeds to the DIP Lender and to other creditors of the FIGR Group.³⁶

36. Since the granting of the Ancillary Order, the Applicants have acted and continue to act in good faith and with due diligence to advance their restructuring under the CCAA, while maintaining their ordinary course operations and assisting the Monitor with the SISP and the Claims Procedure.³⁷ The Monitor supports the requested extension to the Stay Period, and the Applicants are forecast to have sufficient liquidity to fund their obligations and the costs of the CCAA Proceedings through the end of the proposed extension.³⁸

PART IV: RELIEF REQUESTED

37. The Applicants submit that they meet all of the qualifications required to obtain the requested relief and request that this Court grant the proposed form of Employee Claims Procedure Order and Stay Extension and Fee Approval Order.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

April 27, 2021

³⁶ April 23 Affidavit, *supra* note 1 at para 30; Fourth Report, *supra* note 1 at para 39.

³⁷ April 23 Affidavit, *ibid* at para 34.

³⁸ April 23 Affidavit, *ibid* at paras 31 and 32; Fourth Report, *supra* note 1 at para 40.

SCHEDULE A – LIST OF AUTHORITIES

Cases Cited

1. [Canwest Global Communications Corp, Re, 2011 ONSC 2215](#)
2. [Century Services Inc v Attorney General \(Canada\), 2010 SCC 60](#)
3. [Re Toys “R” Us \(Canada\) Ltd, 2018 ONSC 609](#)
4. [ScoZinc Ltd, Re, 2009 NSSC 136](#)
5. [Target Canada Co, 2015 ONSC 303](#)
6. [Timminco Ltd, Re, 2014 ONSC 3393](#)

SCHEDULE B – STATUTES RELIED ON

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

Section 11

General Power of Court

Despite anything in the *Bankruptcy and Insolvency Act* or the *Winding-up and Restructuring Act*, if an application is made under this Act in respect of a debtor company, the court, on the application of any person interested in the matter, may, subject to the restrictions set out in this Act, on notice to any other person or without notice as it may see fit, make any order that it considers appropriate in the circumstances.

Section 11.02

Stays, etc. – initial application

(1) A court may, on an initial application in respect of a debtor company, make an order on any terms that it may impose, effective for the period that the court considers necessary, which period may not be more than 10 days,

- (a) staying, until otherwise ordered by the court, all proceedings taken or that might be taken in respect of the 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 company; and
- (c) prohibiting, until otherwise ordered by the court, the commencement of any action, suit or proceeding against the company.

Stays, etc. — other than initial application

(2) A court may, on an application in respect of a debtor company other than an initial application, make an order, on any terms that it may impose,

- (a) staying, until otherwise ordered by the court, for any period that the court considers necessary, all proceedings taken or that might be taken in respect of the company under an Act referred to in paragraph (1)(a);
- (b) restraining, until otherwise ordered by the court, further proceedings in any action, suit or proceeding against the company; and
- (c) prohibiting, until otherwise ordered by the court, the commencement of any action, suit or proceeding against the company.

Burden of proof on application

(3) The court shall not make the order unless

(a) the applicant satisfies the court that circumstances exist that make the order appropriate;
and

(b) in the case of an order under subsection (2), the applicant also satisfies the court that the applicant has acted, and is acting, in good faith and with due diligence.

Restriction

(4) Orders doing anything referred to in subsection (1) or (2) may only be made under this section.

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Court File No.: CV-21-00655373-00CL

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SUPERIOR COURT OF JUSTICE
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Proceedings Commenced in Toronto

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