

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

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

AND IN THE MATTER OF A PROPOSED PLAN
OF COMPROMISE OR ARRANGEMENT WITH RESPECT TO
GROWTHWORKS CANADIAN FUND LTD.

**AIDE-MEMOIRE OF
INVESTMENT ADMINISTRATION SOLUTION INC.**

February 3, 2026

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TO: **Service List**

1. This Aide Memoire sets out in brief, for the benefit of the Court, an update concerning the position of Investment Administration Solution Inc. (“IAS”) in this matter, and seeks to set a date for IAS’s motion to compel payment of outstanding invoices disputed by the Applicant, GrowthWorks Canadian Fund Ltd. (the “Fund”).
2. IAS is a third-party administrator offering fund accounting and transfer agency administration services to investment funds. IAS has provided these services as a post-filing supplier to Fund under an agreement entered into over 10 years ago in 2015. IAS takes no position on the relief sought on the pending motion, but seeks to ensure that it is not prejudiced on a go-forward basis by the distribution referred to in the Applicant’s motion materials.
3. Since early 2025, IAS and the Fund have had several disputes relating to information requests made by the Fund, and the payment of invoices for services rendered by IAS to satisfy those information requests. As set out in the affidavit of its principal, David Chan, delivered today, IAS denies in the strongest terms the version of events put forward by the Applicant and the Monitor. IAS seeks to set a date for the hearing of that motion.
4. IAS is concerned that, until the fee dispute is resolved, it not be prejudiced by the Fund’s intention to make a distribution without holding back sufficient amounts to satisfy the invoices at issue. In response to these concerns, the Applicant today confirmed that no distribution would be made before February 20, 2026, the outside date for available two-hour motion dates obtained from the registrar’s office.
5. Given that time-limited commitment, IAS asks that the Court fix one of February 18, 19 or 20 for the hearing of IAS’s motion. IAS estimates no more than two hours will be required.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 3rd day of February, 2026.

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Court File No. CV-13-10279-00CL

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PROCEEDING COMMENCED AT TORONTO

**AIDE MEMOIRE OF
INVESTMENT ADMINISTRATION SOLUTION INC.**

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RCP-E 4C (September 1, 2020)