Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

Court File No. BK-26-03429084-0032
Estate No. 32-3429084

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED

AND IN THE MATTER OF THE NOTICES OF INTENTION TO MAKE A PROPOSAL OF SIREG 700 PARKHILL INC., SIREG 1- 4 BALMORAL INC., SIREG 4 CARTIER INC., SIREG 6 CARTIER INC., SIREG 8 CARTIER INC., SIREG 10 CARTIER INC., SIREG 12 CARTIER INC., SIREG 14 CARTIER INC., SIREG 16 CARTIER INC., SIREG 1390 KENSINGTON INC., SIREG 1400-1410 KENSINGTON INC., 1000001856 ONTARIO INC., and 1000366987 ONTARIO CORPORATION

AFFIDAVIT OF ERIC STEELE
sworn October 16, 2026

I, Eric Steele, of the City of Hamilton and the Province of Ontario, affirm that:

1. I am the owner of one (1) condominium unit in Oxford Standard Condominium Corporation No. 116 ("**OSCC 116**") located in Tillsonburg, Ontario. The total number of units in the condominium building is twenty.

2. I am the owner of three (3) condominium units in Perth Standard Condominium Corporation No. 43 ("**PSCC 43**") located in Listowel, Ontario. The total number of units in the condominium building is thirty-two.

3. OSCC 116 is insured by Atrens-Counsel Insurance Brokers with an expiry date of February 1, 2027. A copy of the Certificate of Insurance is attached hereto as **Exhibit "A"**.

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4. PSCC 43 is insured by Atrens-Counsel Insurance Brokers with an expiry date of December 4, 2026. A copy of the Certificate of Insurance is attached hereto as **Exhibit "B"**.

5. Both OSCC 116 and PSCC 43 have retained Sapphire Condominium Management ("**Sapphire**") to assist us in the transition from Sireg to a self-managed board of directors and to provide ongoing condominium management. A copy of the letter confirming their retention is attached hereto as **Exhibit "C"**.

6. I have personally attended at the building since September 2026 and have been actively working with my counsel since that date to ensure our concerns were heard and answers received.

7. I have been self-managing my unit since September 21, 2026 and it is incorrect for the Applicant herein to describe the owners as being uninformed and not engaged. My father, Peter Steele, owns condominium units in Oxford Standard Condominium Corporation No. 117 which is adjacent to OSCC 116. He has also been acting as my agent and the comments made by him in his Affidavit of even date filed in this proceeding regarding utilities and meeting with Sireg staff apply to OSCC 116 as well.

8. I have sent notices by email to the current owners in both buildings. These notices have been acknowledged by all twenty (20) owners of OSCC 116 and nineteen (19) of the thirty-two (32) owners of PSCC 43. I am not aware of any confirmed support by the owners to LDDC's application and all are scheduled to participate in an owner's meeting to elect a new board of directors for the respective condominium corporations, scheduled for:

   (a) PSCC 43 on October 20, 2026 at 6:30 p.m;
   (b) OSCC 116 on October 20, 2026 at 7:45 p.m.

   Both meetings will be chaired by Denise McAsey from Sapphire.

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9. Now that notices have been sent, I expect that the board of directors will be successfully elected at the above-noted owner's meetings.

10. If LDDC are claiming any representation from an owner at OSCC 116 and/or PSCC 43, then I would ask that they provide proof of a signed engagement.

SEVERALLY DECLARED remotely by }
Eric Steele stated as being located in }
the City of Hamilton }
in the Province of Ontario }
before me at the City of Toronto }
in the Province of Ontario, }
on the 16th day of October, 2026, }
in accordance with O. Reg 431/20, }
Administering Declaration Remotely. }

Signed by:
Eric Steele
[illegible]

Signed by:
WOLFGANG J. PAZULLA
[illegible]

A Commissioner, etc.
Wolfgang J. Pazulla
Barrister, Solicitor & Notary Public

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This is Exhibit "A" referred to in the

Affidavit of Eric Steele

Sworn before me this 16 day of October, 2026.

Signed by:
WOLFGANG J. PAZULLA
1398CZ9720AC485...

A Commissioner, etc.
Wolfgang J. Pazulla

Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

Atrens-Counsel
Insurance Brokers
Part of Arthur J. Gallagher Canada Limited

CERTIFICATE OF INSURANCE

This is to certify that insurance described below has been effected with the Insurer(s) shown, subject to the terms and conditions of the policy applicable.

NAMED INSURED: OXFORD STANDARD CONDOMINIUM CORPORATION NO. 116

ADDITIONAL NAMED INSUREDS: ALL REGISTERED UNIT OWNERS FROM TIME TO TIME AND ALL REGISTERED MORTGAGEES FROM TIME TO TIME

PROPERTY INSURED: 187 (Units #101-106, 201-207 and 301-307) Lisgar Avenue
Tillsonburg, Ontario
N4G 3L5

TERM: February 1, 2026 TO February 1, 2027

COMMERCIAL PACKAGE POLICY NO. 501168524

PROPERTY:
Form: Comprehensive All Risk Policy
Amount of Insurance: $3,156,798.00
Deductibles: $ 10,000.00 STANDARD
$ 10,000.00 SEWER BACKUP
$ 10,000.00 WATER
$ 25,000.00 FLOOD
$ 50,000.00 EARTHQUAKE
Company: Novex Insurance Company

COMPREHENSIVE GENERAL LIABILITY:

Limit of Liability: $10,000,000.00
Policy Number: **501168524**
Company: Novex Insurance Company

DIRECTORS AND OFFICERS LIABILITY:

Limit of Liability: $10,000,000.00
Policy Number: **501168524**
Company: Novex Insurance Company

EQUIPMENT BREAKDOWN INSURANCE:

Limit per Accident: $3,156,798.00
Company: Aviva Insurance Company of Canada
Policy Number: **81638409-1795**

This document is furnished as a matter of courtesy and only as information of the fact that Policies have been concurrently prepared. It is not a contract, confers no right upon any person and imposes no liability on the Insuring Companies. A photocopy of this executed Certificate may be relied upon to the same extent as if it were an original executed certificate.

ATRENS-COUNSEL INSURANCE BROKERS
Part of Arthur J. Gallagher Canada Limited

Date: January 20, 2026

Authorized Representative

Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

This is Exhibit "B" referred to in the

Affidavit of Eric Steele

Sworn before me this 16 day of October, 2026.

Signed by:
WOLFGANG J. PAZULLA
1398C76720AC485...

A Commissioner, etc.
Wolfgang J. Pazulla

Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

Atrens-Counsel
Insurance Brokers
Part of Arthur J. Gallagher Canada Limited

CERTIFICATE OF INSURANCE

This is to certify that insurance described below has been effected with the Insurer(s) shown, subject to the terms and conditions of the policy applicable.

NAMED INSURED: PERTH STANDARD CONDOMINIUM CORPORATION NO. 43

ADDITIONAL NAMED INSUREDS: ALL REGISTERED UNIT OWNERS FROM TIME TO TIME AND ALL REGISTERED MORTGAGEES FROM TIME TO TIME

PROPERTY INSURED: 633 Barber Avenue North
Listowel, Ontario
N4W 1S5

TERM: December 4, 2025 TO December 4, 2026

COMMERCIAL PACKAGE POLICY NO. 7143788

PROPERTY:
Form: Comprehensive All Risk Policy
Amount of Insurance: $8,045,434.00
Deductibles: $ 10,000.00 STANDARD
$ 10,000.00 SEWER BACKUP
$ 10,000.00 WATER
$ 25,000.00 FLOOD
$ 50,000.00 EARTHQUAKE
Company: Wawanesa Insurance
Trisura Insurance
Aviva Insurance Company of Canada

COMPREHENSIVE GENERAL LIABILITY:

Limit of Liability: $5,000,000.00
Policy Number: **7143788**
Company: Wawanesa Insurance

DIRECTORS AND OFFICERS LIABILITY:

Limit of Liability: $2,000,000.00
Policy Number: **7143788**
Company: Wawanesa Insurance

EQUIPMENT BREAKDOWN INSURANCE:

Limit per Accident: **$8,045,434.00**
Company: Aviva Insurance Company of Canada
Policy Number: **81638409-2890**

This document is furnished as a matter of courtesy and only as information of the fact that Policies have been concurrently prepared.
It is not a contract, confers no right upon any person and imposes no liability on the Insuring Companies.
A photocopy of this executed Certificate may be relied upon to the same extent as if it were an original executed certificate.

ATRENS-COUNSEL INSURANCE BROKERS
Part of Arthur J. Gallagher Canada Limited

Date: November 3, 2025

Authorized Representative

Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

This is Exhibit "C" referred to in the

Affidavit of Eric Steele

Sworn before me this 16 day of October, 2026.

Signed by:
WOLFGANG J. PAZULLA
1398C76720AC485...

A Commissioner, etc.
Wolfgang J. Pazulla

Docusign Envelope ID: 4A5BFABA-0F42-8EDE-80A9-46E2A4CD8D72

sapphire

sapphirecondomgmt.ca

info@sapphirecondomgmt.ca

(519) 900-4088

October 15, 2026

PRIVATE AND CONFIDENTIAL — BY EMAIL

Mr. Wolfgang Pazulla
Barrister and Solicitor
wolfpazu@gmail.com

Re: Sapphire Condominium Management is Rendering Services to PSCC 43, OSCC 116, OSCC 117, MSCC 601 and MSCC 602

Dear Mr. Pazulla:

We write to advise that Sapphire Condominium Management has been retained by the owners of the following condominium corporations and is rendering our services to them, assisting the owners in the governance of their corporations: **Perth Standard Condominium Corporation No. 43 (633 Barber Avenue North, Listowel); Oxford Standard Condominium Corporation No. 116 (187 Lisgar Avenue, Tillsonburg); Oxford Standard Condominium Corporation No. 117 (191 Lisgar Avenue, Tillsonburg); and Middlesex Standard Condominium Corporation Nos. 601 and 602 (1275 and 1265 Bentley Drive, London).** Sapphire has been retained by the owners and has not been appointed as manager by any of the boards.

The owners of these corporations are not without guidance or direction. The owners have already delivered their requisitions for meetings of owners to SIREG, and owners' meetings have already been scheduled. The official Notices of Meeting have already been delivered to some of the corporations.

This process is in motion and is being managed in an orderly way under the Condominium Act, 1998. In our view, no outside assistance or court-appointed administrator is needed or warranted for these corporations. We understand you are acting for the owners and we provide this letter for your use. We respectfully ask that it be brought to the attention of the court, so that no such appointment is made or relied upon unnecessarily while the owners' process is under way.

We would be pleased to provide any further information you may require. Please contact me at (519) 900-4088 or denise@sapphirecondomgmt.ca. Thank you for your attention to this matter.

Yours truly,

Denise McAsey, CEO, RCM, OLCM-G
Sapphire Condominium Management | CMRAO licence no. 0052848889-CMP
denise@sapphirecondomgmt.ca | (519) 900-4088
4012 Applewood Drive, Petrolia, ON N0N 1R0

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, C. B-3, AS AMENDED
IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF SIREG 700 PARKHILL INC.

Court File No. BK-26-03429084-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

AFFIDAVIT OF ERIC STEELE
sworn October 16, 2026

WOLFGANG J. PAZULLA
Barrister and Solicitor
16 Four Seasons Place, Suite 202
Toronto, Ontario M9B 6E5

LSO No. 17043C
Tel: 416-622-6669
Fax: 416-622-1440
Email: wolfpazu@gmail.com

Lawyer for the unit owners of Oxford Standard Condominium Corp No. 116 and Perth Standard Condominium Corp No. 43

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