Docusign Envelope ID: 6D03AE4B-EE4C-8453-8366-F791693A2B3B

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 PETER STEELE
sworn October 16, 2026

I, Peter Steele, of the Town of Newbury in the County of Middlesex and the Province of Ontario, affirm that:

1. I am the owner of nine (9) condominium units in Oxford Standard Condominium Corporation No. 117 ("**OSCC 117**") located in Tillsonburg, Ontario. The total number of units in the condominium building is eighteen.

2. OSCC 117 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"**.

3. I have personally attended at the building more than ten (10) times since September 2026 and have been actively working with my counsel since that date to ensure our concerns were heard and answers received with respect to the continuing operation of the building pending the election of a new board of directors.

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4. I have been self-managing my units since September 21, 2026 and it is incorrect for the Applicant herein to describe the owners as being uninformed and not engaged.

5. I have communicated by telephone or email with sixteen (16) of the eighteen (18) current owners. None that I have spoken to support LDDC's application and all are scheduled to participate in an owner's meeting scheduled for October 16, 2026 at 6:30 p.m. to elect a new board of directors for the condominium.

6. The two (2) owners who were not yet contacted are Unit 304 which is owned by Sireg, and Unit 103 which is owned by Aaron Wall Janzen who previously resided in the unit. A notice was hand delivered to Mr. Janzen's door on October 15, 2026 concerning the owner's meeting.

7. On October 14, 2026, Sireg provided me with a list of all of the owners. I have confirmed the list with my own property searches conducted via ONLAND and they accord with the Sireg list.

8. I have contacted the City of Tillsonburg, and they have acknowledged the situation and confirmed to me that the utilities (water, sewage, electricity) are not under threat of being disconnected. They will not provide account status until a board of directors has been properly elected, with minutes to support such election, at which time they will share account status. To be clear, the Town of Tillsonburg has a policy to never disconnect services to multi-tenant buildings, as such the threat of getting disconnected in the City of Tillsonburg is not real.

9. OSCC 117 has 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 "B"**.

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10. We have also been following the advice given on the Condominium Management Regulatory Authority of Ontario (CMRAO) website provided to unit owners of properties affected by the collapse of Sireg.

11. I have established contact with Linda Schmeltz, Sireg's on-site agent, and Mike Haskin, Sireg's on-site maintenance technician. Both have been extremely helpful in bringing any issues to our attention and are familiar with the condominium building.

12. I was contacted by a fellow owner, Angelo Agostino, who reported to me that he was sent an email from LDDC informing him that he had signed up for LDDC and was required to pay an amount of $5,650.00, being half of the retainer fee. He indicated he had never signed up for anything and responded to the LDDC contact person, Maria Garofalo, by email on October 13, 2026 indicating that he was not participating with LDDC. A copy of this email is attached hereto as **Exhibit "C"**.

13. If LDDC is claiming any representation from an owner at OSCC 117, then I would ask that they provide proof of a signed retainer.

14. The unit owners of OSCC 117 will be in complete control of the condominium corporation and its financial affairs on or before October 31, 2026.

SEVERALLY DECLARED remotely by }
Peter Steele stated as being located in }
the Town of Newbury in the County of }
Middlesex 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:
Peter Steele
Peter Steele

Signed by:
WOLFGANG J. PAZULLA
A Commissioner, etc.
Wolfgang J. Pazulla
Barrister, Solicitor & Notary Public

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This is Exhibit "A" referred to in the

Affidavit of Peter Steele

Sworn before me this 16 day of October, 2026.

Signed by:
WOLFGANG J. PAZULLA
1398C787...

A Commissioner, etc.
Wolfgang J. Pazulla

Docusign Envelope ID: 6D03AE4B-EE4C-8453-8366-F791693A2B3B

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. 117

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

PROPERTY INSURED: 191 (Units 101-106, 201-206 & 301-306) Lisgar Avenue
Tillsonburg, Ontario
N4G 3L5

TERM: February 1, 2026 to February 1, 2027

COMMERCIAL PACKAGE POLICY NO. **501168525**

PROPERTY:
Form: Comprehensive All Risk Policy
Amount of Insurance: $2,782,480.00
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: **501168525**
Company: Novex Insurance Company

DIRECTORS AND OFFICERS LIABILITY:

Limit of Liability: $10,000,000.00
Policy Number: **501168525**
Company: Novex Insurance Company

EQUIPMENT BREAKDOWN INSURANCE:

Limit per Accident: $2,782,480.00
Company: Aviva Insurance Company of Canada
Policy Number: **81638409-1796**

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: February 20, 2026

Authorized Representative

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This is Exhibit "B" referred to in the

Affidavit of Peter Steele

Sworn before me this 16 day of October, 2026.

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

A Commissioner, etc.
Wolfgang J. Pazulla

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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

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This is Exhibit "C" referred to in the

Affidavit of Peter Steele

Sworn before me this 16 day of October, 2026.

Signed by:
WOLFGANG J. PAZULLA
139C76720AC485...

A Commissioner, etc.
Wolfgang J. Pazulla

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From: Angelo Agostino <adscontracting@gmail.com>
Date: October 13, 2026 at 5:50:59 PM EDT
To: Maria Garofalo <mgarofalo@lddclawyers.com>, Peter Steele <protractor.peter@gmail.com>
Subject: Condo Corp 117

Good evening Maria

I am not sure why I was sent a retainer for the above Corp but we are not retaining your services for this Corp

Please make sure you don't include me in this litigation

Thank you

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

Court File No. BK-26-03429084-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

AFFIDAVIT OF PETER 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. 117

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