

Court File No. CV-25-00001143-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

THE HONOURABLE ) THURSDAY, THE 19<sup>TH</sup>  
 )  
JUSTICE FOWLER BYRNE ) DAY OF MARCH, 2026

B E T W E E N:

**ROYAL BANK OF CANADA**

Applicant

- and -

**DIXIE CHRYSLER LTD.**

Respondent



**IN THE MATTER OF AN APPLICATION PURSUANT TO SECTION  
243(1) OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3,  
AS AMENDED; AND SECTION 101 OF THE *COURTS OF JUSTICE ACT*,  
R.S.O. 1990 c. C.43, AS AMENDED**

**DISCHARGE ORDER**

**THIS MOTION**, made by Zeifman Partners Inc., ("**Zeifman**") in its capacity as the Court-appointed receiver (the "**Receiver**") of all of the assets, properties and undertaking of Dixie Chrysler Ltd. (the "**Debtor**"), was heard this day by Zoom video conference.

**ON READING** the second report of the Receiver dated January 21, 2026 (the "**Second Report**"), the affidavit of the Allan Rutman affirmed January 8 2026 (the "**Rutman Affidavit**"), the affidavit of Christine Mason sworn January 19, 2026 (the "**Mason Affidavit**"), and on hearing the submissions of counsel for the Receiver and such other counsel as were present, and on reading the affidavit of service of Mariela Adriana Gasparini sworn January 22, 2026, filed:

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

2. **THIS COURT ORDERS** that capitalized terms not defined herein, shall have the meanings ascribed thereto in the Second Report.

#### **APPROVAL OF ACTIVITIES**

3. **THIS COURT ORDERS** that the Second Report and the activities of the Receiver as set-out in the Second Report be and are hereby approved; provided, however, that only the Receiver, in its personal capacity and only with respect to its own personal liability shall be entitled to rely upon or utilize such approval.

#### **APPROVAL OF RECEIPTS AND DISBURSEMENTS**

4. **THIS COURT ORDERS** that the Receiver's Statement of Receipts and Disbursements as at January 8, 2026, be and is hereby approved.

#### **APPROVAL OF FEES**

5. **THIS COURT ORDERS** that the fees and disbursements of the Receiver for the period from July 1, 2025 to December 31, 2025, including the estimated fees and disbursements of the Receiver up to its date of its discharge, as described in the Rutman Affidavit, be and are hereby approved.

6. **THIS COURT ORDERS** that the fees and disbursements of Borden Ladner Gervais LLP ("**BLG**"), legal counsel to the Receiver, for the period from July 1, 2025 to January 16, 2026, including the estimated fees and disbursements of BLG for services to be provided to the Receiver up to the date of discharge of the Receiver, as described in the Mason Affidavit, be and are hereby approved.

## DISCHARGE OF THE RECEIVER

7. **THIS COURT ORDERS** that the Receiver be and is hereby authorized and directed to destroy certain books and records of the Debtor which in the possession of the Receiver, as described in the Second Report, upon the filing of the Discharge Certificate (as defined below).

8. **THIS COURT ORDERS** that upon the Receiver's filing of a discharge certificate with the Court, substantially in the form attached as Schedule "A" (the "**Discharge Certificate**"), certifying that it has completed the Remaining Duties, as defined and described in the Second Report, the Receiver shall be discharged as Receiver of the assets, property and undertaking of the Debtor, provided however that notwithstanding its discharge herein: (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein, and (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of Zeifman in its capacity as Receiver.

9. **THIS COURT ORDERS AND DECLARES** that Zeifman is hereby released and discharged from any and all liability that Zeifman now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of Zeifman while acting in its capacity as Receiver herein. Without limiting the generality of the foregoing, Zeifman is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings.



**SCHEDULE “A”: FORM OF RECEIVER’S DISCHARGE CERTIFICATE**

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R.S.O. 1990 c. C.43, AS AMENDED**

**RECEIVER’S DISCHARGE CERTIFICATE**

- A. Pursuant to an Order of Madam Justice Shaw of the Ontario Superior Court of Justice (the “**Court**”) dated May 16, 2025, Zeifman Partners Inc. was appointed receiver (the “**Receiver**”) of all the assets, properties and undertaking of Dixie Chrysler Ltd. (the “**Debtor**”) pursuant to section 243 of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended and section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended.
- B. Pursuant to an Order of the Court dated March 19, 2026 (the “**Discharge Order**”) the Court ordered, *inter alia*, that the Receiver be discharged, effective upon the filing by the Receiver of a certificate certifying the matters set out herein.
- C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Discharge Order.

**THE RECEIVER HEREBY CERTIFIES** the following:

1. The Receiver is satisfied, in its discretion, that it has completed its remaining duties, as set out in the Receiver's Second Report to the Court dated January 21, 2026.
2. This Certificate was delivered by the Receiver at \_\_\_\_\_ (*time*) on \_\_\_\_\_ (*date*).

**Zeifman Partners Inc.**, in its capacity as court-appointed receiver of the assets, properties and undertaking of Dixie Chrysler Ltd.

Per: \_\_\_\_\_

Name:

Title:

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 PROCEEDING COMMENCED AT BRAMPTON

**RECEIVER'S DISCHARGE CERTIFICATE**

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Lawyers for the Receiver, Zeifman Partners Inc.

**ROYAL BANK OF CANADA**

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- and -

**Applicant**

**Respondent**

**ONTARIO  
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PROCEEDING COMMENCED AT BRAMPTON

**DISCHARGE ORDER**

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