

Court File No. CV-24-00720816-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

B E T W E E N:

SIENA LENDING GROUP CANADA LLC

Applicant

and

GLOBAL FOOD AND INGREDIENTS INC., GLOBAL FOOD AND
INGREDIENTS LTD. and GFI BRANDS INC.

Respondents

APPLICATION UNDER Section 243 of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended, and under section 101 of the *Courts of Justice Act*, RSO 1990, c C.43, as amended

***AIDE MEMOIRE OF THE APPLICANT*
(SCHEDULING APPEARANCE – JUNE 17, 2025)**

LENCZNER SLAGHT LLP

Barristers

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Lawyers for the Plaintiffs

TO: **SERVICE LIST**

1. This appearance is to schedule a hearing date and set a timetable for the Applicant's motion to lift the stay of proceedings under section 69 of the *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, to permit the Applicant, Siena Lending Group Canada LLC ("**Siena**"), to issue a claim against the Debtor, Global Food and Ingredients Ltd. ("**GFI Ltd.**"), and certain of its former directors and officers for negligence, negligent misrepresentation, and breach of contract in order to enable Siena to seek recovery on a contract of insurance held by GFI Ltd.

2. Since the June 4, 2025 scheduling appearance, counsel for the individual defendants in the proposed claim has confirmed that the individual defendants will not be opposing the motion. The motion will accordingly proceed with the consent of the Receiver and unopposed by any other party.

3. Siena respectfully requests that this Court endorse the following expedited timetable for the hearing of the motion:

- Notice of Motion and Motion Record: Served on May 15, 2025
- Moving Factum: by June 20, 2025
- Motion to be heard the week of June 23, 2025 (or as soon as possible thereafter), subject to the Court's availability.

4. All of which is respectfully submitted this 16th day of June, 2025.



Devon R. Kapoor

SIENA LENDING GROUP CANADA LLC

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PROCEEDING COMMENCED AT TORONTO

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LENDING GROUP CANADA LLC**

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Lawyers for the Applicant, Siena Lending Group
Canada LLC

RCP-F 4C (September 1, 2020)