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February 11, 2021

**BY EMAIL**

Sanjeev Mitra/Sam Babe  
Aird & Berlis  
Barristers & Solicitors  
Suite 1800 - 181 Bay Street  
Toronto, ON M5J 2T9

Dear Counsel:

**RE: In the Matter of the Administration Proceedings of Carriage Hills Vacation Owners Association (CHVOA) Court File No. CV-20-00640265CL and the Carriage Ridge Owners Association (CROA) Court File No. CV-20-00640266CL**

We represent Lori Smith, Karen Levins and Bruce Fleming.

We have had an opportunity to review your motion record returnable on February 16, 2021, with our clients and have the following comments:

1. We understand that Thornton Grout and Finnigan LLP has been working on this file. Did they render any accounts in respect of this work, and if so, are these accounts in the motion record?
2. With respect to the collection order, would you kindly advise of the following:
  - (a) where the collection receipts will be deposited and when and how they will be distributed to the unit holders;
  - (b) whether the units taken over by Wyndham are delinquent and whether these delinquencies will be collected;
  - (c) how much of these delinquencies have already been collected and where they are deposited;
  - (d) the nature of the arrangement between CICR and the Receiver. Is this a commission arrangement or has CICR been assigned and/or purchased these receivables?

- (e) you have indicated there will be a settlement amount in each collection package sent to the delinquent owners. Can you tell me what this amount will be and how it was arrived at?

My clients advise that it is their understanding that the Receiver and the collection agency have been seeking compensation and funds from Estates and survivors of these Estates. On the grounds of compassion, my clients would prefer if there was no settlement activity in respect of these outstanding amounts owed by Estates.

Yours very truly,

**Blaney McMurtry LLP**



Lou Brzezinski

LB/jb