

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

**APPLICATION UNDER 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**

BETWEEN:

**MBL ADMINISTRATIVE AGENT II LLC, as agent for POST ROAD  
SPECIALTY LENDING FUND II LP (f/k/a MAN BRIDGE LANE  
SPECIALTY LENDING FUND II (US) LP), and POST ROAD SPECIALTY  
LENDING FUND (UMINN) LP (f/k/a MAN BRIDGE LANE SPECIALTY  
LENDING FUND (UMINN) LP)**

Applicant

-and-

**TRADE X GROUP OF COMPANIES INC., 12771888 CANADA INC., TVAS INC.,  
TRADEXPRESS AUTO CANADA INC., TRADE X FUND GP INC., TRADE X LP FUND  
I, TRADE X CONTINENTAL INC., TX CAPITAL CORP., TECHLANTIC LTD. AND  
TX OPS CANADA CORPORATION**

Respondents

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**SUPPLEMENTAL AFFIDAVIT OF WOUTER VAN ESSEN**

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I, **WOUTER VAN ESSEN**, of the City of Oakville in the Province of Ontario, **MAKE OATH AND AFFIRM:**

1. I am the principal of 1309767 Ontario Ltd. ("**130 Ontario**") and 2601658 Ontario Ltd. ("**260 Ontario**", and together with 130 Ontario, the "**Van Essen Companies**"), and as such, I have direct and personal knowledge of the matters deposed to herein except where stated to be on information and belief, and where so stated, I believe them to be true.

2. This supplemental affidavit is sworn in support of our motion seeking to stay the rights and claims of the Receiver, FTI Consulting Canada Inc., and any related parties, and for an order granting judgment in the Motion and Cross-Motion in favour of the Van Essen Companies.

**A. Corrections to Exhibit C to my Affidavit Sworn May 21, 2024**

3. My affidavit sworn on May 21, 2024, includes a chart listing the solicitor-client privileged emails at Exhibit C.

4. Mark Dunn's affidavit, sworn May 23, 2024, identified “errors and inconsistencies” in the chart.

5. I am advised by my counsel and do verily believe that the errors were caused by a chart formatting issue, which caused the data from rows C15-19 and C29-31 to be copied into the wrong columns (the sender was omitted and erroneously replaced with the recipient, with the other information placed one column to the left of where it ought to be).

6. These errors have been corrected in the chart included as **Exhibit “A”**, hereto. There is also a compare document that indicates the revisions made. The corrected chart should be referred to in place of the chart included Exhibit C (pages 36-40) of my May 21, 2024, Affidavit. This correction was sent to all counsel on May 27, 2023.

Sworn remotely by Wouter Van Essen )  
of the City of Oakville in the Province )  
of Ontario before me at the City of )  
Toronto in the Province of Ontario on )  
this 28th day of May, 2024, in )  
accordance with O. Reg. 431/20, )  
Administering an Oath Remotely. )



**Alexis Beale**  
Commissioner for Taking Affidavits, etc.

Wouter Van Essen  
Wouter Van Essen (May 28, 2024 16:14 EDT)

**Wouter Van Essen**

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This is Exhibit "A"  
to the Affidavit of Wouter Van Essen  
sworn remotely in accordance with O. Reg. 431/20,  
Administering an Oath Remotely,  
this 28<sup>th</sup> day of May, 2024



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Commissioner for Taking Affidavits, etc.  
Alexis Beale (LSO #65902W)

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Tab	Document ID	M-Master Date	M-Email From	M-Email To	M-Email CC	Reviewer Name and Group	Type of Privilege Asserted
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Applicant

Respondents

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**ONTARIO  
SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)**

Proceeding commenced at Toronto

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**SUPPLEMENTAL AFFIDAVIT  
OF WOUTER VAN ESSEN**

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# Binder1

Final Audit Report

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