

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

BETWEEN:

**CERTAIN LLOYD'S UNDERWRITERS and 3303128 CANADA
INC. T/A ALTERNATIVE RISK SERVICES**

Applicants

-and-

**REAL ESTATE COUNCIL OF ONTARIO; and
ROYAL BANK OF CANADA**

Respondents

NOTICE FOR CLAIMS AGAINST GRAYDON HILL REALTY LTD.

Notice of any and all claims by any potential creditor of and against Graydon Hill Realty Ltd. ("Graydon Hill") must be filed with the undersigned on or before **October 6, 2025**, after which date there will be no consideration of any further potential claims regarding Graydon Hill by the undersigned.

Dated at Toronto, this 29th day of September 2025.

TAKE NOTICE THAT:

On July 22, 2025, Lloyd's Underwriters and 3303128 Canada Inc. t/a Alternative Risk Services (hereinafter, "Lloyd's") brought an application in the Ontario Superior Court of Justice for relief including an order for directions or an order relating to the disposition of assets and/or funds that are affected by:

- a freeze order ("Freeze Order") that was issued by the Director, pursuant to section 25(1) of *Real Estate and Business Brokers Act, 2002* (Ontario) that is now the *Trust in Real Estate Services Act, 2002* ("TRESA"), on January 18, 2013, in relation to assets and funds of Graydon Hill.

BACKGROUND:

The Real Estate Council of Ontario (hereinafter, "RECO") is responsible for administering **TRESA** on behalf of the Government of Ontario. The Director is appointed by the board of RECO pursuant to section 2 of **TRESA**.

Graydon Hill was registered as a real estate brokerage, located at 203-124 Merton Street, Toronto, and its broker of record was David Allen.

On January 12, 2013, pursuant to subsection 25(1) of REBBA, the Director issued the Freeze Order that, *inter alia*, ordered the branch of the Royal Bank of Canada, located at 10 St. Clair Avenue West, Toronto, Ontario, M4T 1L7, to hold any and all assets and/or trust funds which were being kept and maintained by Graydon Hill in any account.

On February 11, 2013, the registrations of Graydon Hill and David Allen were revoked.

TAKE NOTICE THAT:

IF YOU HAVE A CLAIM AGAINST GRAYDON HILL REALTY LTD. AND WISH TO MAKE A CLAIM AGAINST THE ASSETS OR TRUST FUNDS THAT ARE AFFECTED BY THE FREEZE ORDER OR NOTICES DESCRIBED ABOVE, YOU MUST GIVE NOTICE IN WRITING TO THE LAWYERS OF THE APPLICANTS, WHOSE CONTACT INFORMATION IS BELOW, BY OCTOBER 6, 2025, FAILING WHICH THE APPLICATION TO THE ONTARIO SUPERIOR COURT OF JUSTICE REFERRED TO ABOVE IS SCHEDULED TO BE HEARD BY THE COURT ON OCTOBER 7, 2025, AND DIRECTIONS MAY BE GIVEN CONCERNING THE ASSETS, TRUST FUNDS AND/OR LAND AFFECTED BY THE FREEZE ORDERS AND THE NOTICE, WITHOUT FURTHER NOTICE TO YOU.

To provide official notice in writing, or for further information about the Application or this notice, contact:

Jeffrey S. Klein, Klein & Schonblum Associates

Email: jklein@kslaw.com

Telephone: 416-480-0221

Dated at Toronto this 29th day of September, 2025.