

Court File No. CV-20-00649154-00CL

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

B E T W E E N:

CLEARFLOW COMMERCIAL FINANCE CORP.

Applicant

- and -

TRIGGER WHOLESALE INC., THE EN CADRE GROUP INC., MARK
GDAK, JAIMEE LYNN GDAK and JAIMAK REAL PROPERTIES
INC.

Respondents

APPLICATION UNDER Sections 243(1) and 47(1) of the *Bankruptcy and Insolvency Act*, R.S.C.1985, c. B-3, Section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43 and Rule 40.01 of the *Rules of Civil Procedure*

**REPLY TO SECOND FURTHER SUPPLEMENTARY REPLY
APPLICATION RECORD**

March 15, 2021

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AND TO: SERVICE LIST

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AFFIDAVIT

I, Jaimee Lynn Gdak, of the City of Waterloo, in the Regional Municipality of Waterloo, **SOLEMNLY AFFIRM AND SAY:**

1. I am one of the Respondents in this proceeding. Where statements are made on information and belief, or where from the context it appears that I rely upon the information provided by others, I verily believe such statements to be true.

2. On March 10, 2021, the Applicant delivered a “Second Further Supplementary Reply Applicant Record,” which contained the Affidavit of Alexandra (Sandy) Kanichis sworn March 9, 2021.

3. I have difficulty understanding how Ms. Kanichis reconciles her sudden “recollection” that ClearFlow uses the software she describes in her Affidavit with the fact that she is the Director of Operations of the Applicant.

4. I flatly deny the assertion made by Ms. Kanichis that “[u]ntil Mike Nero of Trigger took over this function in 2018, Jaimee was frequently the individual at Trigger who accessed Cadence.” In fact, I may have accessed the Cadence system two or three times during my entire tenure at Trigger.

5. On those rare occasions, I was told the userid and password to use (which were not unique to me and were assigned to Trigger as a whole), what buttons to click to upload data, and what data to upload. That was the extent of my involvement with the application. I have no recollection of ever seeing a screen that looks anything like that which appears as Exhibit “B” to Ms. Kanichis’ Affidavit nor would I have had any call to access anything but the necessary screens to complete the upload.

6. On the one specific occasion I do recall, I was in a panic because I could not get on to the application’s web site and I had to pick up my children. I was unable to upload

data. As Sandy and I never talked on the phone, initially I had trouble tracking down her phone number. Once I reached her, Sandy said not to worry about it and that she had enough information to do it on her end.

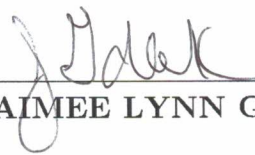
7. I make this Affidavit in reply to the herein Application and for no other or improper purpose.

Affirmed remotely by Jaimee Lynn Gdak of the City of Waterloo in the Regional Municipality of Waterloo, before me at the City of London in the County of Middlesex on March 15, 2021 in accordance with O. Reg. 431/20, *Administering Oath or Declaration Remotely*.



Commissioner for Taking Affidavits
(or as may be)

BENJAMIN G. BLAY



JAIMEE LYNN GDAK

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-and-

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Service List