

Link & Associates Inc.

Receivers + Trustees

District of Ontario
Division No. 11 – Kingston
Court No. 33-2929085
Estate No. 33-2929085

April 4, 2023

To: The Creditors of LA SALLE MOTEL CO. (KINGSTON) LTD.

Re: Notice of Intention to Make a Proposal

TAKE NOTICE THAT LA SALLE MOTEL CO. (KINGSTON) LTD. (“La Salle” or the “Company”) filed a Notice of Intention to Make a Proposal (“NOI”) under Division I, Part III, of the Bankruptcy and Insolvency Act (“BIA”) on April 3, 2023.

LINK & ASSOCIATES INC. Receivers + Trustees has consented to act as trustee under the NOI (the “Proposal Trustee”).

Pursuant to Section 69 of the BIA, all proceedings against the Company are stayed effective April 3, 2023.

Attached please find the following documents:

1. Certificate of Filing of the Notice of Intention
2. Notice of Stay of Proceedings
3. A copy of the NOI and a list of creditors owed or claimed to be owed \$250 or more
4. Consent of the Trustee

The Company expects to file a proposal (the “Proposal”) within 30 days of the filing of the NOI, in accordance with the requirements of the BIA, and subject to any extension(s) to the time period for filing of the Proposal that may be granted by the Court. A copy of the Proposal, when filed, will be sent to each of the creditors together with a notice calling a meeting of creditors to consider the Proposal, such meeting to be held within 21 days of the Proposal being filed. A report of the Trustee will also be provided to the creditors.

It is important for all creditors to know that the Company has not filed for bankruptcy. Rather, it is in the process of developing a Proposal to its creditors which is intended to result in a better recovery to the creditors than would otherwise be available in a bankruptcy.

During the Proposal proceedings:

- (i) No person or creditor can commence or continue any action, execution or other proceedings for the recovery of a debt until the Trustee has been discharged, or until the Proposal has been refused, without leave of the Court and on such terms as the Court may impose.

Tel. 416.862.7785 Fax. 416.862.2136
enquiries@linkassociates.ca

7050 Weston Road, Suite #228, Woodbridge, ON Canada L4L 8G7

The firm of Link & Associates Inc. is a Licensed Insolvency Trustee

- (ii) No person or creditor may terminate or amend any agreement with the Company, or claim an accelerated payment, or a forfeiture of the term, under any agreement with the Company by reason only that the Company is insolvent or by reason of the filing of the NOI;
- (iii) Suppliers of goods and services to the Company should discuss directly with its management, the terms of payment for goods and/or services that they will provide to the Company after the date of filing of the NOI.

At present, creditors are not required to file a proof of claim. The Trustee will provide you with further information and a proof of claim form and voting letter at a later date, once the Proposal has been filed.

During these Proposal proceedings, the Company continues to be under the direction of its management.

The above measures are mandated by the BIA and are necessary to ensure that all creditors of the Company are treated equitably in the Proposal process, and no creditor exercises remedies in a manner that it receives preferential treatment relative to other creditors.

Yours truly,

LINK & ASSOCIATES INC.

Proposal Trustee in re

La Salle Motel Co. (Kingston) Ltd.

Per: Robert G. Link, LIT

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For all creditor inquiries, please contact James Merryweather from the office of the Trustee below, or visit our website at www.linkassociates.ca for further information.

James Merryweather, CPA, CGA

Email: jmerryweather@linkassociates.ca

Phone: (416) 473-8356

Fax: (416) 862-2136



Industry Canada
Office of the Superintendent
of Bankruptcy Canada

Industrie Canada
Bureau du surintendant
des faillites Canada

District of Ontario
Division No. 11 - Kingston
Court No. 33-2929085
Estate No. 33-2929085

In the Matter of the Notice of Intention to make a proposal of:

LA SALLE MOTEL CO. (KINGSTON) LTD.

Insolvent Person

LINK & ASSOCIATES INC.

Licensed Insolvency Trustee

Date of the Notice of Intention:

April 03, 2023

CERTIFICATE OF FILING OF A NOTICE OF INTENTION TO MAKE A PROPOSAL
Subsection 50.4 (1)

I, the undersigned, Official Receiver in and for this bankruptcy district, do hereby certify that the aforementioned insolvent person filed a Notice of Intention to Make a Proposal under subsection 50.4 (1) of the Bankruptcy and Insolvency Act;

Pursuant to subsection 69. (1) of the Act, all proceedings against the aforementioned insolvent person are stayed as of the date of filing of the Notice of Intention.

Date: April 03, 2023, 09:35

E-File/Dépôt Electronique

Official Receiver

Place Bell Canada, 160 Elgin Street, 11th Floor, Suite B-100, Ottawa, Ontario, Canada, K2P2P7, (877)376-9902

Canada 

District of: Ontario
Division No. 12 - Ottawa
Court No. 33-
Estate No. 33-

- FORM 33 -

Notice of Intention To Make a Proposal
(Subsection 50.4(1) of the Act)

In the Matter of the Proposal of
LA SALLE MOTEL CO. (KINGSTON) LTD.

Take notice that:

1. I, LA SALLE MOTEL CO. (KINGSTON) LTD., an insolvent person, state, pursuant to subsection 50.4(1) of the Act, that I intend to make a proposal to my creditors.
2. Link & Associates Inc. of 7050 Weston Road, Suite #228, Woodbridge, ON, L4L 8G7, a licensed trustee, has consented to act as trustee under the proposal. A copy of the consent is attached.
3. A list of the names of the known creditors with claims of \$250 or more and the amounts of their claims is also attached.
4. Pursuant to section 69 of the Act, all proceedings against me are stayed as of the date of filing of this notice with the official receiver in my locality.

Dated at the City of Kingston in the Province of Ontario, this 1st day of April 2023.



LA SALLE MOTEL CO. (KINGSTON) LTD.
Insolvent Person

To be completed by Official Receiver:

Filing Date

Official Receiver

IN THE MATTER OF THE PROPOSAL OF
LA SALLE MOTEL CO. (KINGSTON) LTD.

List of Creditors with claims of \$250 or more

Deemed Trust Claims

1	Canada Revenue Agency (HST)	120,000.00		
	Subtotal Deemed Trust	120,000.00	\$	120,000.00

Secured Creditors

2	Bank of Montreal	871,000.00		
3	Master Card (Bank of Montreal)	25,694.15		
4	Employee Vacation Pay (various)	27,012.97		
	Subtotal Secured Creditors	923,707.12	\$	923,707.12

Unecured Creditors

5	AMEX Bank of Canada	5,000.00
6	Aviva Insurance Company of Canada	1,323.00
7	Bell Canada	333.80
8	Booking.com B.V	829.70
9	Breadman of Kingston	2,755.02
10	Bunzl Canada Kingston	2,362.00
11	Canada Bread Co.	2,655.58
12	Canadian Tire	1,739.54
13	Choquette CKS	303.41
14	City of Kingston (Property Tax)	3,721.71
15	Coca Cola Canada Bottling Limited	1,208.86
16	Cogeco Connexion Inc.	1,005.37
17	Collections Group of Canada	345.38
18	Enbridge	20,813.28
19	Esslinger Foods Ltd.	1,193.30
20	Evertemp Inc	3,630.86
21	Expedia Group	752.37
22	Findlay Foods (Kingston) Ltd.	56,773.90
23	Gordon Food Service	40,017.79
24	HTG Sports Services	306.31
25	Hydro One Networks Inc.	21,924.39
26	Joe Deodato & Family	11,340.22
27	John Karkoulis	95,765.20
28	Kingston Accomodation Partners Inc	11,596.48
29	Kone Inc.	1,415.50
30	Mac & Co Environmental solutions	4,862.78
31	Ontario Ministry of Finance	250.00
32	Oracle Canada ULC	4,203.45
33	Peter Karkoulis Sr.	110,000.00
34	Relm Sports	355.95
35	St. Lawrence Pools	265.50
36	Superior Lodging Development TL Corporation	22,866.82
37	Sysco Food	10,589.37
38	Sysco Guest Supply Canada Inc.	5,997.48
39	Telus	940.90
40	Tony Ferrusi's Dairy	3,530.02
41	Travelodge Hotels Inc.	30,214.69
42	Troy Life & Fire Safety Ltd.	290.41

IN THE MATTER OF THE PROPOSAL OF
LA SALLE MOTEL CO. (KINGSTON) LTD.

List of Creditors with claims of \$250 or more

43	Utilities Kingston	11,098.09		
44	Viner Kennedy Frederick Allan Tobias	22,000.00		
45	Workplace Safety Insurance Board	12,072.34		
	Subtotal Unsecured Creditors	528,650.77	\$	528,650.77

Contingent Creditors - Lawsuits

46	Andrea Karkoulis (by her Litigation Guardian)	3,500,000.00		
47	Hao Chen and 1000073686 Ontario Inc.	Unquantified		
48	Peter J. Karkoulis	5,000,000.00		
49	Peter J. Karkoulis	359,000.00		
	Subtotal Contingent Claims	8,859,000.00	\$	8,859,000.00

TOTAL CLAIMS - ALL CATEGORIES

\$ 10,431,357.89

District of Ontario
Division No. 12 - Ottawa
Court No. 33 - TBD
Estate No. 33 - TBD

**IN THE MATTER OF THE NOTICE OF INTENTION
TO MAKE A PROPOSAL OF
LA SALLE MOTEL CO. (KINGSTON) LTD.
OF THE CITY OF KINGSTON, IN THE PROVINCE OF ONTARIO**

CONSENT

LINK & ASSOCIATES INC., Licensed Insolvency Trustee, hereby consents to act as the Proposal Trustee of LA SALLE MOTEL CO. (KINGSTON) LTD. pursuant to the provisions of the Bankruptcy and Insolvency Act.

DATED at the City of Kingston this 31st day of March, 2023.

LINK & ASSOCIATES INC.

Per:

Robert G. Link LIT

7050 Weston Road, Suite #228
Woodbridge, ON L4L 8G7
Phone: (416) 737-6655 Fax: (416) 862-2136