

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE JUSTICE)	FRIDAY, THE 2 ND DAY OF
J. DIETRICH)	
)	MAY, 2025

B E T W E E N:

LOGPIN INVESTMENTS LIMITED, THE GOLDFARB CORPORATION,
GARY GOLDFARB, JEFFREY GOLDFARB, SUZY S. GREENSPAN and
JULIANNA GREENSPAN

Plaintiffs

and

SANDFORD SUSSMAN, a.k.a. SANDY SUSSMAN, SUSSMAN MORTGAGE FUNDING
INC., 2486976 ONTARIO INC., 1981361 ONTARIO INC., 2114568 ONTARIO INC.,
ALLIANCE HOMES LTD., ALEX TROOP, BALLYMORE BUILDING (INNISFIL) CORP.,
WATERWAYS OF MUSKOKA LTD., MARY CHMIEL, LORI RAHAM and LIISA BIER

Defendants

NOTICE

If the Defendant, Sandford Sussman a.k.a Sandy Sussman, to whom this Order applies, disobeys this Order, he may be held to be in contempt of court and may be imprisoned, fined or have their assets seized. Mr. Sussman is entitled to apply on at least twenty-four (24) hours notice to the Plaintiffs, for an Order granting sufficient funds for ordinary living expenses and legal advice and representation.

Any other person who knows of this Order and does anything which helps or permits Mr. Sussman to breach the terms of this Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

ORDER

THIS MOTION, made by the Plaintiffs for an interim Order for a *Mareva* injunction, restraining the Defendants, Sanford Sussman a.k.a. Sandy Sussman (“**Sussman**”) and Sussman Mortgage Funding Inc. (“**SFMI**”) (collectively the “**Sussman Defendants**”) from directly or indirectly, in any manner, disposing of, selling, removing, dissipating, alienating, transferring, assigning, encumbering or similarly dealing with any of their assets, together with an Order requiring the Sussman Defendants and the Defendants Mary Chmiel Lori Raham and Liisa Bier or any of them to forthwith provide to the Plaintiffs, or as they may direct, a full and complete accounting of all mortgages, investments, properties (including but not limited to the properties described in the Notice of Motion as the Ballymore Project, the Waterways Project, or the Uptergrove Project), or assets of any kind into which the Plaintiffs’ funds were, or were supposed to have been invested into, was heard this day in Toronto.

ON READING the consent of the Plaintiffs and Sussman, and on noting the undertaking of the Plaintiffs to abide by any Order this Court may make concerning damages arising from the granting and enforcement of this Order,

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion, Motion Record, and the Statement of Claim is hereby abridged and validated, and service on the Sussman Defendants in the manner served is hereby validated, so that this motion is properly returnable today, and hereby dispenses with further service thereof.

MAREVA INJUNCTION

2. **THIS COURT ORDERS** that Sussman, and his servants, employees, agents, assigns, officers, directors and anyone else acting on his behalf or in conjunction with him, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:

- a. selling, removing, dissipating, alienating, transferring, assigning, encumbering, or similarly dealing with any of his assets, wherever situate;
- b. instructing, requesting, counselling, demanding, or encouraging any other person to do so; and
- c. facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so.

3. **THIS COURT ORDERS** that paragraph 2 applies to all of Sussman's assets whether or not they are in the name of Sussman and whether they are solely or jointly owned. For the purpose of this Order, Sussman's assets include any asset which he has the power, directly or indirectly, to dispose of or deal with as if it were his own, but do not include SMFI, 2486976 Ontario Inc. or 1981361 Ontario Inc. (collectively, the "**Receivership Companies**"). Sussman is to be regarded as having such power if a third party holds or controls the assets in accordance with his direct or indirect instructions.

Ordinary Living Expenses

4. **THIS COURT ORDERS** that Sussman may apply for an Order, on at least twenty-four (24) hours notice to the Plaintiffs, specifying the amount of funds which Sussman is entitled to spend on ordinary living expenses and legal advice and representation.

Disclosure of Information

5. **THIS COURT ORDERS** that Sussman prepare and provide to the Plaintiffs within 5 days of the date of service of this Order, a sworn statement describing the nature, value, and location of his assets worldwide whether in Sussman's own name or not and whether solely or jointly owned or whether owned directly or indirectly.

6. **THIS COURT ORDERS** that Sussman submit to an examination under oath within 10 days of the delivery of the aforementioned sworn statement.

7. **THIS COURT ORDERS** that if the provision of any of this information is likely to incriminate Sussman, he may be entitled to refuse to provide it but is recommended to take legal advice before refusing to provide the information. Wrongful refusal to provide the information referred to in paragraph 5 herein is contempt of court and may render Sussman liable to be imprisoned, fined, or have his assets seized.

Third Parties

8. **THIS COURT ORDERS** that any chartered bank or financial institution (the "**Banks**") or any person having knowledge of this Order shall forthwith freeze and prevent any removal or transfer of monies or assets of Sussman held in any account or on credit on behalf of Sussman, until further Order of this Court. For greater certainty, paragraphs 8 and 9 herein shall not apply to the Receivership Companies, which shall be governed by the Receivership Order made this day in the proceeding under Court File No. CV-25-00741044-00CL (*Chief Executive Officer of The Financial Services Regulatory Authority of Ontario v. Sussman Mortgage Funding Inc. et al*) (the "**Receivership Order**").

9. **THIS COURT ORDERS** that the Banks forthwith disclose and deliver up to the Plaintiffs any and all records held by the Banks concerning Sussman's assets and accounts, including the existence, nature, value and location of any monies or assets or credit, wherever held on behalf of Sussman by the Banks.

Alternative Payment of Security into Court

10. **THIS COURT ORDERS** that this Order will cease to have effect if Sussman provides security by paying the sum of \$45,000,000 into Court, and the Accountant of the Superior Court of Justice is hereby directed to accept such payment.

Variation, Discharge or Extension of Order

11. **THIS COURT ORDERS** that anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order, on 10 days notice to the Plaintiffs.

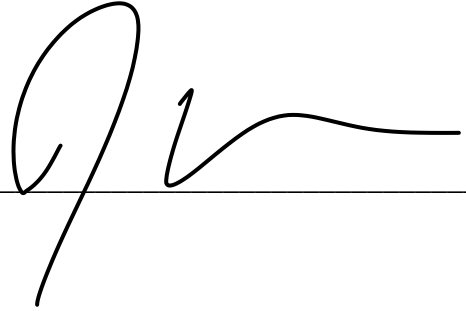
Other

12. **THIS COURT ORDERS** that Sussman forthwith surrender his passport to the Receiver appointed under the Receivership Order.

13. **THIS COURT ORDERS** that the Plaintiffs be at liberty and are hereby authorized and empowered to apply to any court, tribunal, regulatory or administrative body, wherever located, for the recognition of this Order and for assistance in carrying out the terms of this Order, and that the Plaintiffs are authorized and empowered to act as a representative in respect of the within proceedings for the purpose of having these proceedings recognized in a jurisdiction outside Canada.

14. **THIS COURT ORDERS** that Sussman shall pay the Plaintiffs' costs of this motion, up to and including entry and service of this Order on a substantial indemnity basis, fixed in the amount of \$20,000.00.

15. **THIS COURT ORDERS** that nothing in this Order shall be interpreted to, or executed in a manner which may, conflict or interfere with the Receivership Order.



A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish, is written over a horizontal line.

LOGPIN INVESTMENTS LIMITED et al.
Plaintiffs

-and- SANDFORD SUSSMAN, a.k.a. SANDY SUSSMAN et al.
Defendants

Court File No. CV-25-00740475-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

PROCEEDING COMMENCED AT TORONTO

ORDER

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