

ONTARIO SECURITIES COMMISSION

**IN THE MATTER OF MINER EDGE INC., MINER EDGE CORP. and RAKESH
HANDA**

FILE NO: 2019-44

**MOTION OF
DALBIR KELLEY**

(Motion for removal as counsel of record)

The counsel of record, Dalbir Kelley, makes a motion for removal as counsel of record.

A. ORDER SOUGHT

The Moving Party, Dalbir Kelley, requests with notice, that the Ontario Securities Commission make the following order(s):

1. An Order removing Mark Persaud, Dalbir Kelley and the Persaud Law Group Professional Corporation as counsel of record.

B. GROUNDS

The grounds for the motion are:

1. The irreparable breakdown of the solicitor-client relationship between Mr. Rakesh Handa and counsel at the Persaud Law Group Professional Corporation..
2. Such further and other grounds as counsel may advise and the Panel may permit.

C. EVIDENCE

The Moving Party intends to rely on the following evidence for the motion:

1. The Affidavit of Loktin Got, sworn May 10, 2021;
2. Any and all other evidence that counsel may advise that may assist the Panel.

DATED this 10th day of May, 2021

PERSAUD LAW GROUP
PROFESSIONAL CORPORATION
203-5001 Yonge Street
Toronto, Ontario, M2N 6P6

Dalbir Kelley
LSO#: 80022N
Tel: (416) 918-8857
Fax: (416) 224-8020
E-mail: dalbir@persaudlaw.ca

Lawyers for the Respondents

TO: Ontario Securities Commission
20 Queen Street West, 20th Floor
Toronto, Ontario, M5H 3S8