

**IN THE MATTER OF**

**HARRY STINSON, BUFFALO GRAND HOTEL INC., STINSON HOSPITALITY  
MANAGEMENT INC., STINSONS HOSPITALITY CORP., RESTORATION FUNDING  
CORPORATION, BUFFALO CENTRAL LLC, AND STEPHEN KELLEY.**

File No. #2022-3

**AMENDED MOTION**

**OF HARRY STINSON, BUFFALO GRAND HOTEL INC., STINSON HOSPITALITY  
MANAGEMENT INC., STINSONS HOSPITALITY CORP., RESTORATION  
FUNDING CORPORATION, BUFFALO CENTRAL LLC (“Moving Parties”)**

(For amendment of timetable contained in Order of Tribunal dated October 4, 2022 under Rule  
23(2), and 28 of the Capital Markets Tribunal *Rules of Procedure*)

**A. ORDER SOUGHT**

The Moving Parties bring this motion in writing to request an order on consent, that the Tribunal make the following order:

1. The timetable contained in the Order of the Tribunal dated October 4, 2022 (as amended by the Notice from the registrar dated October 28, 2022) be varied, in part, as follows:
  - a. by 4:30 p.m. on February 10, 2023, each party shall serve the other parties with a hearing brief containing copies of the documents, and identifying the other things, that the party intends to produce or enter as evidence at the merits hearing;
  - b. by 4:30 p.m. on February 17, 2023, each party shall provide to the Registrar a completed copy of the *E-hearing Checklist for Videoconference Hearings*;
  - c. The final interlocutory attendance in this proceeding is scheduled for February 23, 2023 at 10:00 a.m., by videoconference, or on such other date and time as may be agreed to by the parties and set by the Governance & Tribunal Secretariat; and
- c. all other deadlines and hearing dates shall remain the same.

## **B. GROUND**

The grounds for the motion are:

2. By order dated October 4, 2022, the Capital Markets Tribunal set a schedule for the order of proceedings in this matter (the “**Timetable Order**”).
3. On October 28, 2022, the Timetable Order was amended by notice of the registrar to change some of the hearing dates.
4. On December 14, 2022, the Moving Parties delivered their Notice of Change of Representation appointing WeirFoulds LLP as its lawyers in this matter.
5. The Moving Parties require additional time to, among other things, obtain the relevant documents from their previous counsel, and generally get their new counsel up to speed with respect to the documents and other things that the Moving Parties intend to produce or enter as evidence at the merits hearing of this matter.
6. As a result, the Moving Parties are seeking to amend the Timetable Order as set out above.
7. This motion is on consent of the other parties.

## **C. EVIDENCE**

The moving parties intend to rely on the following evidence for the motion:

1. Email exchange among counsel confirming agreement to new timetable.

**DATED** this 5<sup>th</sup> day of January, 2023.

**WEIRFOULDS LLP**  
Barristers and Solicitors  
Toronto-Dominion Centre, PO Box 35  
66 Wellington Street West, Suite 4100  
Toronto, ON M5K 1B7

Wayne Egan (LSO #31033C)  
[wegan@weirfoulds.com](mailto:wegan@weirfoulds.com)

Susan Han (LSO #28451F)

[shan@weirfoulds.com](mailto:shan@weirfoulds.com)

Macdonald Allen (LSO #63540B)

[mallen@weirfoulds.com](mailto:mallen@weirfoulds.com)

Tel: 416-365-1110 /Fax: 416-365-1876

Representative for Harry Stinson, et al

**TO:** **STAFF OF THE ONTARIO  
SECURITIES COMMISSION**  
20 Queen Street West  
Toronto, ON M5H 3S8

Rikin Morzaria  
[rmorzaria@osc.gov.on.ca](mailto:rmorzaria@osc.gov.on.ca)

**Representative for the OSC**

**AND TO:** **WRIGHT TEMELINI LLP**  
411 Richmond Street East, Suite 303  
Toronto, ON M5A 3S5

Greg Temelini  
[greg@wrighttemelini.com](mailto:greg@wrighttemelini.com)

**Representative for Stephen Kelley**