



ONTARIO SUPERIOR COURT OF JUSTICE  
(COMMERCIAL LIST)

**COUNSEL/ENDORSEMENT SLIP**

COURT FILE NO.: CV-24-00712995-00CL

NO. ON LIST: 4

TITLE OF PROCEEDING: INTEL CENTERS INC. et al v. IOTICITI NETWORKS INC. et al

BEFORE: JUSTICE CAVANAGH

**PARTICIPANT INFORMATION**

**For Plaintiff, Applicant, Moving Party:**

| Name of Person Appearing | Name of Party                        | Contact Info           |
|--------------------------|--------------------------------------|------------------------|
| Jakob Bogacki            | Lawyer for the receiver, Russo Corp. | jbogacki@szklaw.ca     |
| Joanne Russo             | Russo Corp., Receiver                | russo@russocanhelp.com |

**For Defendant, Respondent, Responding Party:**

| Name of Person Appearing | Name of Party | Contact Info |
|--------------------------|---------------|--------------|
|                          |               |              |

**For Other, Self-Represented:**

| Name of Person Appearing | Name of Party | Contact Info |
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|                          |               |              |

**ENDORSEMENT OF JUSTICE CAVANAGH:**

- [1] Pursuant to the terms of the Order of the Honourable Justice Wilton-Siegel dated April 4, 2024 (the "Appointment Order"), Russo Corp. ("Russo") was appointed as investigatory and possessory

receiver (in such capacity the "Receiver") over the assets, undertakings and properties of Ioticity Networks Inc. (the "Company") pursuant to section 101 of the Courts of Justice Act, R.S.O. 1990, c. C.43, as amended ("CJA").

[2] The Appointment Order gave the Receiver, among other things, the power to settle, extend or compromise any indebtedness owing to the Company, and to settle or compromise any proceedings with respect to the Company.<sup>2</sup> The Receiver, on behalf of the Company, entered into a Settlement Agreement with RadioMobile, Inc. ("RadioMobile"), James Moore, and Kathleen Moore (the "Settlement Agreement"). On the Receiver's motion heard on July 24, 2025, the Honourable Justice J. Dietrich approved the Settlement Agreement (the "July 2025 Order").

[3] In accordance with the terms of the court-approved Settlement Agreement, the Receiver seeks orders:

- a. regarding the action in the Ontario Superior Court of Justice in Newmarket (the "Newmarket Court") bearing Court File No. CV-20-00002909-0000, commenced by the Company (then known as Metro Connect International, Inc.) against RadioMobile, James Moore, and Kathleen Moore (the "Ontario Litigation"),
  - i. the immediate dismissal of the Ontario Litigation, with prejudice and without costs; or
  - ii. leave for the Receiver to forthwith file a Notice of Discontinuance, with prejudice and without costs, with the Newmarket Court to discontinue the Ontario Litigation without further notice to the Plaintiff and Defendants to the Ontario Litigation; and
- b. vesting of all the Receiver's right, title, and interest, if any, in the shares of RadioMobile currently held by the Company (the "Shares") to James Moore and Kathleen Moore.

[4] The Receiver also seeks further orders (a) approving the Fourth Report of the Receiver dated October 10, 2025 in the actions, activities, and conduct of the receiver described therein; (b) approving the Receiver's Interim Statement of Receipts and Disbursements as of October 10, 2025; (c) approving the fees and expenses of counsel for the Receiver and counsel for the Receiver in the USA; and (d) payment of the Applicants' costs of the receivership application

[5] There is no opposition to this motion.

[6] I am satisfied that the requested order to give effect to the court-approved Settlement Agreement should be made.

[7] I am satisfied that the further requested orders should be made.

[8] Order to issue in form of Order signed by me today.