

**ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST**

THE HONOURABLE) ON TUESDAY, THE 21ST DAY
)
JUSTICE CAVANAGH) OF OCTOBER, 2025

B E T W E E N:

INTEL CENTERS INC. and ITALO SABATO
and SILVANO ZACCHIGNA and MARIA ALICIA MAJLUF

Applicants

- and -

IOTICITI NETWORKS INC. and RONALD FRANK
and DARREN FRANK and LOU GALLUCCI

Respondents

ORDER

THIS MOTION made by Russo Corp. in its capacity as the Court-appointed investigatory and possessory receiver (in such capacity, the "**Receiver**"), without security, of all the assets, undertakings, and properties of Ioticiti Networks Inc. (the "**Company**") for an Order, among other things, approving the actions, activities, and conduct of the Receiver as described in the Fourth Report of the Receiver dated October 10, 2025 (the "**Fourth Report**"), was heard this day via video conference at the Courthouse at 330 University Avenue, 8th Floor, Toronto, Ontario.

ON READING the Fourth Report and on hearing the submissions of counsel for the Receiver, no one appearing for any other person on the service list, although properly served,

1. **THIS COURT ORDERS** that that the time for service of the Receiver's Notice of Motion and Motion Record is hereby abridged and validated so that this motion is properly returnable today and hereby dispenses with further service thereof.
2. **THIS COURT ORDERS** that the Fourth Report and the activities and conduct of the Receiver as set out in the Fourth Report be and are hereby approved; provided, however, that only the Receiver, in its personal capacity and only with respect to its own personal liability, shall be entitled to rely upon or utilize in any way such approval.
3. **THIS COURT ORDERS** that the Receiver shall have leave to file a Notice of Discontinuance, with prejudice and without costs, to discontinue the action bearing Court File No. CV-20-00002909-0000 in the Ontario Superior Court of Justice in Newmarket, forthwith upon receiving payment of the Settlement Amount as defined in the Settlement Agreement as defined in the Fourth Report.
4. **THIS COURT ORDERS** that upon the filing with this Court of a Receiver's certificate substantially in the form attached hereto as Schedule "A" (the "**Receiver's Certificate**"), all of the Receiver's right, title, and interest, if any, in and to the shares in RadioMobile, Inc. that are held by the Company (the "**Shares**") shall vest absolutely in James Moore and Kathleen Moore, free and clear of and from any and all security interest (whether contractual, statutory, or otherwise), liens, executions, levies, charges, or other financial or monetary claims, whether or not they have attached or been perfected, registered or filed and whether secured, unsecured or otherwise including, without limiting the generality of the foregoing: (i) any encumbrances or charges created by the Order of the Honourable Justice Wilton-Siegel dated April 4, 2024; and (ii) all charges, security interests or claims evidenced by registrations pursuant to the

Personal Property Security Act (Ontario) or any other personal property registry system and, for greater certainty, this Court orders that all of the encumbrances affecting or relating to the Shares are hereby expunged and discharged as against the Shares.

5. **THIS COURT ORDERS** that the Receiver's Interim Statement of Receipts and Disbursements (the "**Interim SRD**") appended to the Fourth Report, is hereby approved.
6. **THIS COURT ORDERS** that the fees and disbursements of the Receiver and its counsel, Spetter Zeitz Klaiman PC ("**SZK**") and Snell & Wilmer ("**S&W**"), including an accrual for fees and disbursements to be incurred to the completion of these proceedings, as set out in the Fourth Report and the Fee Affidavits, are hereby approved.
7. **THIS COURT ORDERS** that the fees and disbursements of SZK in its capacity as counsel for the Applicants, as set out in the Forth Report and in the Cost Outline attached as Exhibit "A" to the Fee Affidavit of Jakob Bogacki sworn October 10, 2025 (the "**Applicants' Costs**"), shall be paid to the Applicants or otherwise as the Applicants may direct.
8. **THIS COURT ORDERS** that this Order and all its provisions are effective as of 12:01 a.m. Eastern Standard/Daylight Time on the date of this Order without the need for entry or filing.

Schedule "A"

Court File No. CV-24-00712995-00CL

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and SILVANO ZACCHIGNA and MARIA ALICIA MAJLUF

Applicants

- and -

IOTICITI NETWORKS INC. and RONALD FRANK
and DARREN FRANK and LOU GALLUCCI

Respondents

RECEIVER'S CERTIFICATE

RECITALS

A. Pursuant to an Order of the Honourable Justice Wilton-Siegel of the Ontario Superior Court of Justice (the "**Court**") dated April 4, 2024, Russo Corp. was appointed as investigatory and possessory receiver (the "**Receiver**") of the undertaking, property and assets of Ioticiti Networks Inc. (the "**Debtor**").

B. Pursuant to an Order of the Court dated July 24, 2025, the Court approved the Settlement Agreement entered into on June 30, 2025 (the "**Settlement Agreement**") between the Receiver and RadioMobile, Inc., James Moore, and Kathleen Moore and provided for the vesting in James Moore and Kathleen Moore (the "**Moore**s") of the Receiver's right, title and interest in and to the shares in RadioMobile, Inc. that are held by the Debtor (the "**Share**s"), which vesting is to be effective with respect to the Shares upon the filing by the Receiver in this Court of a certificate confirming the receipt of the Settlement Amount as defined at Paragraph 1 of the Settlement Agreement.

C. Unless otherwise indicated herein, terms with initial capitals have the meanings set out in the Settlement Agreement.

THE RECEIVER CERTIFIES the following:

1. RadioMobile, Inc., James Moore, and Kathleen Moore have paid, and the Receiver has received, the Settlement Amount as defined at Paragraph 1 of the Settlement Agreement.
2. This Certificate is being filed by the Receiver on _____.

**RUSSO CORP., in its capacity as Receiver of
the undertaking, property and assets of
IOTICITI NETWORKS INC., and not in its
personal capacity**

Per: _____

Name:

Title:

INTEL CENTERS INC. et al.

Applicants

-and-

IOTICITI NETWORKS INC. et al.

Respondents

Court File No.: CV-24-00712995-00CL

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PROCEEDING COMMENCED AT
TORONTO

ORDER

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