Court File No. CV-26-00001999-0000

ONTARIO

SUPERIOR COURT OF JUSTICE

IN THE MATTER OF SECTION 243(1) OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1985, c. B-3, AS AMENDED, AND SECTION 101 OF THE COURTS OF JUSTICE ACT, R.S.O. 1990, c. C.43, AS AMENDED

B E T W E E N:

RAPIDSCREEN HOLDINGS INC.

Applicant

- and -

ECOLUTION.AG INC.

Respondent

NOTICE OF MOTION

(Form 37A, Rules of Civil Procedure)

GUS VASILAKIS, a director, shareholder and creditor of the Respondent, Ecolution.AG Inc. (the "Moving Party"), will make a motion to the Court on **Thursday, October 29, 2026, at 10:00 a.m.**, or as soon after that time as the motion can be heard, together with the Application scheduled for that time, at the Superior Court of Justice, 85 Frederick Street, Kitchener, Ontario N2H 0A7.

PROPOSED METHOD OF HEARING: The motion is to be heard:

☐ in writing under subrule 37.12.1 (1) because it is on consent, unopposed or made without notice;

☐ in writing as an opposed motion under subrule 37.12.1 (4);

☐ in person;

☐ by telephone conference;

☒ **by video conference**, at the same videoconference link as the Application, the details of which the Moving Party has requested from the Court and from counsel for the Applicant.

THE MOTION IS FOR:

1. An Order abridging the time for service and filing of this Notice of Motion and the supporting Affidavit of Gus Vasilakis, validating service as made, and permitting this motion to be heard together with the Application on October 29, 2026;

2. An Order granting the Moving Party leave to participate in, and to make submissions at, the hearing of the Application as an interested person, and adding him to the service list at his personal email address;

3. An Order adjourning the Application for a period of approximately 21 days, or to such other date as this Honourable Court may fix, so that the Moving Party may retain counsel, deliver responding evidence and, if necessary, cross-examine Steve Livshin on his affidavit;

4. In the alternative, if this Honourable Court is inclined to appoint a receiver on October 29, 2026, an Order that the Appointment Order include terms:

   (a) directing the Receiver to investigate, secure and report to the Court within 30 days on the location and condition of the Property described in the Affidavit of Gus Vasilakis, including property removed from 1615 Highland Road West, Kitchener on or about September 5, 2025; the storage containers at U-Need Storage, 2093 Highway 6, Freelton, Ontario; inventory in Mexico; and the Debtor's regulatory registrations in Canada, the United States and Central America;

   (b) confirming that the Debtor's current and former directors and officers, including Steve Livshin and Dennis Reich, must disclose to the Receiver the location of all Property, including the "bonded secured warehouse" referred to in Mr. Livshin's email of June 19, 2025;

   (c) confirming that nothing in the Order prejudices the Moving Party's claims as a creditor, employee or shareholder of the Debtor, or any claim he may have against the Debtor's current or former directors or officers personally, and that the stay of proceedings in the Order does not extend to such claims against directors or officers; and

   (d) requiring that the Moving Party be served with all further materials, reports and motions in this proceeding, including notice of the timing and terms of any sale of the Debtor's assets;

5. An Order that no costs be awarded against the Moving Party on this motion; and

6. Such further and other relief as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

The Moving Party

1. The Moving Party is a co-founder, a director and a shareholder of the Respondent, Ecolution.AG Inc. (the "Debtor"). The Corporations Canada profile in the Applicant's own evidence (Exhibit 1 to the Affidavit of Steve Livshin, Application Record pp. 20–22) lists him as a director and as an individual with significant control holding at least 25% and up to 50% of the Debtor's shares;

2. The Moving Party is also a creditor of the Debtor. He claims unpaid wages, expenses and earned sales commissions for work performed from approximately August 30, 2024 to June 30, 2025;

Notice

3. The Moving Party was not personally served with the Notice of Application. The service list names him only in care of the Debtor at the corporate address gus@ecolution.ag, and misspells his surname as "Vasiliakis". His password to that account stopped working in or about December 2025. He did not change it, and he has had no access since. His residential address appears in the Applicant's own evidence;

4. The Moving Party first learned of the Application on October 16, 2026, from another shareholder, and has acted as quickly as he reasonably could to obtain documents and advice and to bring this motion;

5. The Application Record contains no affidavit of service, and the recital in the draft Appointment Order leaves the deponent and date of service blank (Application Record p. 108). The Applicant asks the Court to abridge and validate service (Notice of Application, para. 1(a)). That relief should not be granted as against the Moving Party without hearing him;

Independence of the Debtor's position

6. Steve Livshin, who swore the Applicant's affidavit, is a director of the Applicant and remains the interim Chief Executive Officer of the Debtor (Livshin Affidavit, paras. 1–2). He states that he has resigned as a director of the Debtor, yet the Corporations Canada profile attached to his affidavit still lists him as a director (see CBCA s. 113, notice of change of directors);

7. Dennis Reich, a director of the Debtor, is, to the Moving Party's understanding, an owner of the Applicant, and is listed at 886 Woodlawn Road, Sudbury, the same address given for the Applicant in the PPSA registration (Application Record pp. 21, 96). Two of the Debtor's six directors are therefore connected to the Applicant, although the Applicant's loan covenant provides for only one nominee director on a board of fewer than eight (Application Record p. 87). The Debtor's directors and officers owe their duties to the

Debtor (CBCA s. 122(1); CBCA s. 120, disclosure of interest). In these circumstances the Debtor's response to the Application may not reflect independent decision-making, and the Court would benefit from hearing an independent director and shareholder;

Completeness of the evidence about the Debtor's property and creditors

8. The Applicant's evidence describes the Debtor's assets as primarily GrowMas inventory and intellectual property, with inventory in Panama (Livshin Affidavit, paras. 10–11). It does not address: (i) equipment, inventory and supplies removed from 1615 Highland Road West, Kitchener on or about September 5, 2025 for transfer to a "bonded secured warehouse"; (ii) storage containers at U-Need Storage, Freelton, Ontario, where on October 16, 2026 the Moving Party found inventory missing; (iii) inventory delivered to storage near Texcoco, Mexico; and (iv) the Debtor's regulatory registrations, including Canadian Food Inspection Agency registration No. 2024777S (valid to June 21, 2029) and registrations in Panama, Honduras and El Salvador;

9. The Applicant states that unsecured debts are "not currently known" but less than $500,000 (Notice of Application, para. 2(r); Livshin Affidavit, para. 28), without referring to the Moving Party's claims, although his lawyer had sent the Debtor's board a written demand for about $180,000 in late July 2026;

The law

10. A receiver may be appointed only where it is "just or convenient" to do so (BIA s. 243(1); Courts of Justice Act, s. 101). That assessment considers the interests of all stakeholders, which the Court can only weigh fairly on complete evidence and after hearing those affected;

11. A receiver must act honestly, in good faith and in a commercially reasonable manner in dealing with the Debtor's property (BIA s. 247). Specific direction to locate and secure the property identified by the Moving Party is consistent with those duties;

12. Rules 1.04, 2.01, 2.03, 3.02, 13.01, 37 and 39.02 of the Rules of Civil Procedure, R.R.O. 1990, Reg. 194;

13. Such further and other grounds as the Moving Party may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

1. The Affidavit of Gus Vasilakis sworn/affirmed October 28, 2026, and the Exhibits "A" to "F" attached to it;

2. The Application Record of the Applicant dated October 16, 2026; and

3. Such further and other material as the Moving Party may advise and this Honourable Court may permit.

October 28, 2026

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GUS VASILAKIS

75 Perth Road, Kitchener, Ontario N2M 3G6

Tel: 416-841-0540

Email: gus.vasil@startmail.com

Moving Party (self-represented); Director, Shareholder and Creditor of the Respondent

TO:	**DICKINSON WRIGHT LLP** 199 Bay Street, Suite 2200, Box 447, Commerce Court Postal Station, Toronto, ON M5L 1G4 David Z. Seifer (LSO #77474F) – dseifer@dwlaw.com – (416) 646-6867 Talya R. Bertler (LSO #90315H) – tbertler@dwlaw.com – (416) 777-2394 Lawyers for the Applicant
AND TO:	**ECOLUTION.AG INC.** 151 Charles Street West, Suite 100, Kitchener, ON N2G 1H6 Attention: Albert Santosh Kumar Selvaraj – albert@ecolution.ag Respondent
AND TO:	**GOLDHAR & ASSOCIATES LTD.** – Attention: Evan MacKinnon – emackinnon@ethosadvisory.ca Proposed Receiver
AND TO:	**FOGLER, RUBINOFF LLP** – Vern DaRe (vdare@foglers.com), Scott Venton (sventon@foglers.com), Spencer Thompson (sthompson@foglers.com) Counsel to the Proposed Receiver
AND TO:	**THE SERVICE LIST** in the Application Record dated October 16, 2026

RAPIDSCREEN HOLDINGS INC. Applicant	-and-	**ECOLUTION.AG INC.** Respondent

Court File No. CV-26-00001999-0000

ONTARIO SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT KITCHENER

NOTICE OF MOTION

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