File No. CI 20-01-26627

THE QUEEN'S BENCH WINNIPEG CENTRE

IN THE MATTER OF THE RECEIVERSHIP OF NYGÅRD HOLDINGS (USA) LIMITED, NYGARD INC., FASHION VENTURES, INC., NYGARD NY RETAIL, LLC, NYGARD ENTERPRISES LTD., NYGARD PROPERTIES LTD. 4093879 CANADA LTD., 4093887 CANADA LTD., AND NYGARD INTERNATIONAL PARTNERSHIP

RICHTER ADVISORY GROUP INC.
SUPPLEMENTARY EIGHTH REPORT OF THE RECEIVER

OCTOBER 12, 2020

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I. INTRODUCTION

- On March 18, 2020 (the "Appointment Date"), pursuant to an order (the "Receivership Order") of the Court of Queen's Bench (Winnipeg Centre) (the "Manitoba Court") made in Court File No. CI 20-01-26627 (the "Canadian Proceedings"), Richter Advisory Group Inc. ("Richter") was appointed as receiver (in such capacity, the "Receiver") of the assets, undertakings and properties (the "Property") of Nygård Holdings (USA) Limited, Nygard Inc., Fashion Ventures, Inc., Nygard NY Retail, LLC (collectively, the "US Debtors""), Nygard Enterprises Ltd. ("NEL"), Nygard International Partnership ("NIP"), Nygard Properties Ltd. ("NPL"), 4093879 Canada Ltd., and 4093887 Canada Ltd. (collectively, the "Canadian Debtors") (the US Debtors and the Canadian Debtors together, the "Nygard Group" or the "Debtors") to exercise the powers and duties set out in the Receivership Order, pursuant to section 243(1) of the Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, (the "BIA") and section 55 of The Court of Queen's Bench Act, C.C.S.M. c.C280.
- 2. The Receivership Order was granted pursuant to an application made by White Oak Commercial Finance, LLC, (the "Agent") as administrative agent and collateral agent for and on behalf of White Oak and Second Avenue Capital Partners, LLC (collectively, the "Lenders") pursuant to security held by the Lenders in the Property of the Debtors provided in connection with a certain loan transaction and a revolving credit facility (the "Credit Facility") provided thereunder.
- 3. The Credit Facility was provided to the Debtors pursuant to a Credit Agreement dated December 30, 2019 (the "Credit Agreement" and together with other associated documents, the "Lenders' Security") as defined in, and attached as Exhibit "D" to, the Affidavit of Robert Dean affirmed March 9, 2020 and filed in these proceedings.
- 4. Also on March 18, 2020, the Receiver, as the duly appointed foreign representative (the "Foreign Representative") of the Debtors, commenced proceedings in the United States Bankruptcy Court for the Southern District of New York (the "US Court") by filing, among other things, petitions on behalf of the Receiver in relation to the Debtors pursuant to sections 1504 and 1515 of the US Bankruptcy Code seeking recognition by the US Court of the Canadian proceedings as a foreign main proceeding (the "Chapter 15 Proceedings"). On March 26, 2020, the US Court entered, among other things, a provisional recognition order and, on April 23, 2020, the US Court granted a final order recognizing, among other things, the Canadian Proceedings as the foreign main proceeding. The Canadian Proceedings and the Chapter 15 Proceedings are together hereinafter referred to as the "Receivership Proceedings".
- On April 29, 2020, the Manitoba Court made various Orders, including an Order (the "Sale Approval Order")
 which, among other things, approved an agreement (the "Consulting and Marketing Services Agreement")

between the Receiver and a contractual joint venture comprised of Merchant Retail Solutions, ULC, Hilco Merchant Resources, LLC, Hilco IP Services, LLP dba Hilco Streambank, and Hilco Receivables, LLC (collectively, "Hilco" or the "Consultant"), and White Oak Commercial Finance, LLC, pursuant to which the Consultant will provide certain consulting, marketing and related asset disposition services. In addition, as it appeared that a going concern or "en-bloc" sale of the Nygard Group's assets was not likely, the Sale Approval Order authorized the Receiver to liquidate the Nygard Group's retail inventory and owned furniture, fixtures and equipment through temporarily re-opened stores (the "Liquidation Sale"), as soon as circumstances permit. As certain details regarding the Liquidation Sale of particular importance to landlords of the Nygard Group's retail stores (the "Landlords") were not capable of being known with any precision or certainty at that time (given COVID-19 restrictions on non-essential business activities), the Sale Approval Order set out a process that required the Receiver to obtain a further order of the Manitoba Court addressing certain specified matters prior to commencement of the Liquidation Sale.

- 6. On April 29, 2020, the Manitoba Court made two (2) further Orders: (i) an Order (the "General Order") addressing, among other things, various general matters, including certain amendments to the Receivership Order (limiting the scope of the Receivership Order in relation to the property, assets and undertakings of NEL and NPL) and the procedure for landlord access to properties leased to Nygard Inc. by certain non-Debtor members of the Nygard organization, and (ii) an Order (the "DEFA Order") establishing the protocol for requesting access to and / or production of documents and electronic files purported to be in the possession or control (or subject to the possession or control) of the Receiver by certain non-Debtor members of the Nygard organization or directors, officers and employees of the Nygard Group.
- 7. On May 13, 2020, Edson's Investments Inc. ("Edson's") and Brause Investments Inc. ("Brause" and collectively, the "Gardena Landlords") filed a notice of motion (the "Gardena Motion") with the Manitoba Court for an order requiring the Receiver to (i) pay occupancy rent and maintain the California Properties (as hereinafter defined) in accordance with the leases thereof and (ii) to advise the Gardena Landlords of its intentions regarding the occupancy of the California Properties by no later than May 31, 2020, or in the alternative, an order lifting of the stay of proceedings granted by the Manitoba Court in these proceedings so that the Gardena Landlords may terminate the California Properties Leases for failure of the Receiver to pay occupancy rent and retake possession of the California Properties. The Gardena Motion, which was originally scheduled to be heard by the Manitoba Court on August 10, 2020, was rescheduled to be heard on September 14, 2020, however the Gardena Motion did not proceed as a result of the E/B Settlement Agreement, which was dealt with in the Receiver's seventh report dated September 10, 2020.

- 8. On June 2, 2020, as required by the Sale Approval Order and in anticipation of commencing the Liquidation Sale where permitted to do so (taking into consideration local public health orders and related COVID-19 restrictions), the Manitoba Court made an Order (the "Landlord Terms Order") addressing certain Landlord matters in relation to the conduct of the Liquidation Sale.
- 9. On June 30, 2020, the Manitoba Court made an Order (the "Notre Dame Approval and Vesting Order") approving, among other things, the sale of certain NPL real property located at 1300, 1302 and 1340 Notre Dame Avenue and 1440 Clifton Street (the "Notre Dame Property") in Winnipeg, Manitoba.
- 10. On June 30, 2020, the Manitoba Court also made an Order (the "Dillard's Settlement Approval Order") approving, among other things, the terms of an agreed Settlement Agreement and Release of Claims between the Receiver and Dillard's Inc.
- 11. On August 10, 2020, the Manitoba Court made an Order (the "Niagara Approval and Vesting Order") approving, among other things, the sale of certain NPL real property located at 1 Niagara Street in Toronto, Ontario (the "Toronto Property").
- 12. On September 15, 2020, the Manitoba Court made an Order (the "E/B Settlement Approval Order") approving, among other things, the terms of a settlement agreement (the "E/B Settlement Agreement") between the Receiver, the Gardena Landlords, the Lenders, NPL, and Peter Nygard and other members of the Nygard Organization.
- 13. On September 28, 2020, the Receiver filed its eighth report (the "Eighth Report") in support of the Receiver's motion (the "September 30 Motion") returnable on September 30, 2020, and now adjourned to October 14, 2020 (the "October 14 Hearing"), for an Order (the "Document Transfer Order") from the Manitoba Court directing and authorizing the Receiver to, among other things, transfer, if so requested by the Debtors, the Redundant Records (as defined in the Eighth Report) located at certain real property owned by NPL at 1771 Inkster Boulevard in Winnipeg, Manitoba (the "Inkster Property") and 702 & 708 Broadway Avenue in Winnipeg, Manitoba (the "Broadway Property" and together with the Inkster Property, the "Remaining Winnipeg Properties") to the party or parties (the "Transferee") to be identified by counsel for the Debtors.
- 14. In accordance with the Receivership Order, the Receiver has established a website (the "**Receiver's Website**") for the purposes of these proceedings at https://www.richter.ca/insolvencycase/nygard-group.

- 15. Copies of the pleadings and other materials filed in the Receivership Proceedings, other than affidavits and appendices sealed by Order of the Manitoba Court, and the various Orders issued by the Manitoba Court are posted to and available for review at the Receiver's Website.
- 16. Copies of the pleadings and other materials filed in the Chapter 15 Proceedings, and the various Orders issued by the US Court are also posted to and available for review at the Receiver's Website.
- 17. The Receiver has engaged Thompson Dorfman Sweatman LLP (Winnipeg) ("**TDS**") as its Canadian counsel, and Katten Muchin Rosenman LLP (New York) ("**Katten**") as its U.S. counsel.

II. PURPOSE OF REPORT

18. This report (the "Supplementary Eighth Report") is filed by the Receiver to respond to certain matters raised in the Affidavit of Greg Fenske affirmed on September 29, 2020 (the "September 29 Fenske Affidavit") and the Affidavit of Greg Fenske affirmed on October 6, 2020 (the "October 6 Fenske Affidavit" and together with the September 29 Fenske Affidavit, the "Affidavits"), as well address certain matters raised by counsel to the Debtors, Levene Tadman Golub Law Corporation ("LTGLC"), in its Notice of Motion dated dated September 29, 2020 (the "NOM") and its Brief dated October 6, 2020 (the "Brief") filed in response to the Eighth Report and the September 30 Motion.

III. TERMS OF REFERENCE

- 19. In preparing this Supplementary Eighth Report, the Receiver has relied upon information and documents prepared by the Debtors and their advisors, including unaudited, draft and / or internal financial information, the Debtors' books and records, discussions with representatives of the Debtors, including current and former employees, executives and / or directors, legal counsel to Mr. Peter Nygard and certain related non-Debtor entities, the Lenders and their legal counsel, and information from third-party sources (collectively, the "Information"). In accordance with industry practice, except as otherwise described in the Supplementary Eighth Report, Richter has reviewed the Information for reasonableness, internal consistency, and use in the context in which it was provided. However, Richter has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would comply with Generally Accepted Auditing Standards ("GAAS") pursuant to the Chartered Professional Accountant of Canada Handbook and, as such, Richter expresses no opinion or other form of assurance contemplated under GAAS in respect of the Information.
- 20. Parties using this Supplementary Eighth Report, other than for the purposes outlined herein, are cautioned that it may not be appropriate for their purposes, and consequently should not be used for any other purpose.

- 21. Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Eighth Report.
- 22. Unless otherwise noted, all monetary amounts contained in this Supplementary Eighth Report are expressed in Canadian dollars.

IV. RESPONSE TO THE AFFIDAVITS

- 23. Subsequent to the filing of the Eighth Report, the Debtors filed the Affidavits, the NOM and the Brief, all of which contained a number of inaccurate, misleading and false statements made by the Debtors in relation to, among other things, the DEFA Order, requests for access to the Records generally, the pending sale of the Inkster Property, the Document Transfer Motion and the Receiver's data preservation efforts. The Receiver discusses and addresses each of these items below.
- 24. The October 6 Fenske Affidavit references, at Exhibit "B", an email from TDS to LTGLC dated October 4, 2020. Attached hereto as Appendix "A" is a full copy of the email exchange between between TDS and LTGLC which covers a period from October 1 through 4, 2020. This email exhange is being provided so that a complete record of the relevant communications between counsel are before the Manitoba Court. A copy of this same email exchange was also provided to the Manitoba Court by way of an email from TDS on October 7, 2020.

The DEFA Order

- 25. In the September 29 Fenske Affidavit, Mr. Fenske states the Debtors and non-Debtors require current financial records for all companies in order to assess their financial situation and make certain decisions. Mr. Fenske further states the Debtors have engaged Albert Gelman Inc. ("AGI") to, among other things, assess the viability of a proposal to the Debtors' unsecured creditions. As stated in the September 29 Fenske Affidavit, in order to make this assessment, AGI requires the following information (the "AGI Request"):
 - (a) Current chart of accounts;
 - (b) Current detailed trial balance;
 - (c) Detailed trial balance reports as at year end for each of the previous five fiscal years;
 - (d) Corporate tax returns for each of the previous five years;
 - (e) Externally produced financial statements for the previous five years;
 - (f) Current aged accounts payable listing;

- (g) Current aged accounts receivable listing;
- (h) Most recent notice of (re)assessment from the CRA with respect to both HST and corporate income taxes;
- (i) Detailed GL report (the "Detailed GL Data") showing all posted transactions for each of the previous five fiscal years;
- (j) For any/all intercompany accounts (the "Intercompany Data"), detailed GL reports showing all transactions for the previous five years;
- (k) Where there were transactions with related entities outside of the Corporate Group, detailed GL reports from those entities showing all transactions between each of them and the entities comprising the Corporate Group; and
- (I) Three most recently prepared bank reconciliations.
- 26. On April 29, 2020, the Manitoba Court made the DEFA Order, which, among other things, established the protocol for requesting access to and / or production of documents and electronic files purported to be in the possession or control (or subject to the possession or control) of the Receiver by certain non-Debtor members of the Nygard organization or directors, officers and employees of the Debtors. As such, the Receiver advised the Debtors to submit a request pursuant to the DEFA Order for the AGI Request, however the Debtors assert the DEFA Order does not apply in the circumstances as (i) the AGI Request is coming from the Debtors generally or AGI specifically and (ii) the AGI Request does not relate to documents but rather reports that must be pulled from the Debtors' accounting system.
- 27. The Receiver respectfully disagrees with the Debtors' position and is of the view that the DEFA Order applies in respect of the AGI Request since it is emanating from former officers / directors / employees of the Debtors. Further, certain of the information contained in the AGI Request, such as corporate tax returns, externally produced financial statements, and a notice of (re)assessment from CRA, are in fact documents that are either available in physical copy or saved to the IT System.
- 28. Notwithstanding the foregoing and in accordance with the directions provided by the Manitoba Court, on October 9, 2020, the Receiver made copies of 8 of the 12 items contained in the AGI Request, namely items (a) through (h) in paragraph 25 above, available to the Debtors through a dataroom created by the Receiver. The Receiver also provided the Debtors with an invoice for the time spent on the search in accordance with the provisions of the DEFA Order. The Receiver noted to the Debtors that the requested files were prepared by the Debtors' remaining accounting staff based on historical accounting practices and that the Receiver had not audited or

- otherwise attempted to verify the accuracy or completeness of the information. Attached hereto as **Appendix** "B" is a copy of the email exchange between TDS and LTGLC on October 9, 2020.
- 29. As noted in the October 6 Fenske Affidavit, the Receiver had requested a call with the Debtors, or their representatives, to seek further clarification from the Debtors on the remaining 4 items (items (i) to (I) in paragraph 25 above), particularly those that require detailed general ledger data, as these requests were too broad in scope, and would be very time-consuming to produce. For example, the request outlined in paragraph 25 (i) above was for a detailed general ledger report showing all posted transactions for each of the previous five fiscal years, which essentially means a listing of every accounting entry posted by each Debtor since 2016. The Receiver notes that prior to the Appointment Date, the Debtors carried on a complex, integrated business involving the design, manufacture (through multiple suppliers), supply and wholesale and retail sale of multiple product lines and fashion brands of primarily women's fashion apparel throughout North America. As such, in the case of NIP, the Detailed GL Data for the previous 5 years would produce a staggering amount of data, potentially in the millions of rows of entries. The Receiver notes that, despite various communications with the Debtors' counsel, LTGLC has yet to follow up to finalize arrangements for such a call.
- 30. On the evening of October 10, 2020, AGI wrote to the Receiver to advise it had completed a high-level review of the documents provided on October 9, 2020 and to request that the Intercompany Data be produced by the Debtors' accounting and provided to AGI. AGI also noted it required an estimated final statement of receipts and disbursements (the "Estimated Final R&D") from the Receiver in order to estimate the free cash flow available for preferred/unsecured creditors, once the Receiver finalizes its distribution to secured/priority creditors, assuming that the Manitoba Court does not approve the sale of the Inkster Property. AGI advised that both the Intercompany Data and the Estimated Final R&D were critical for its review and requested both items be provided by October 11, 2020 so that the Debtors could prepare for the October 14 Hearing.
- 31. On October 11, 2020, LTGLC wrote to TDS to request a response to the aforementioned requests from AGI for the Intercompany Data and the Estimated Final R&D, and to reiterate the urgency of this information in connection with AGI's stated mandate as well as the NOM (for which no date has been set). LTGLC, on behalf of AGI, also advised TDS that in order to accommodate the concerns raised by the Receiver with respect to the Detailed GL Data, AGI would eliminate certain general ledger accounts (such as sales, inventory, cost of goods sold and others) from the request but that AGI would now require the Detailed GL Data for all companies in the Debtors' accounting system (the "Modified Detailed GL Data"), including certain non-Debtors such as Nygard Biotech Corp, Nygard Ventures, Inc., and Nygard Properties (USA).

- 32. TDS responded to LTGLC on October 11, 2020 to advise that:
 - (a) the Receiver would provide AGI with information relating to its request for the Estimated Final R&D, which may or may not include an updated Statement of Receipts and Disbursements, but would, in any event, summarize the estimated status of "financial matters" relating to the Receivership Proceedings, prior to the October 14 Hearing:
 - (b) the Receiver did not have access to the Debtors' accounting staff on the weekend (particularly not on the Thanksgiving long weekend in Canada) to attend to the requests for the Intercompany Data and the Modified Detailed GL Data; and
 - (c) the information requested by AGI, on behalf of the Debtors, is not urgently required as the matters raised in the NOM are not scheduled to be heard at the October 14 Hearing.
- 33. The Receiver intends to review the requests for the Intercompany Data and the Modified Detailed GL Data, as well as the other remaining items identified in paragraphs 25(k) and (l), with the Debtors' accounting staff once its offices reopen on October 13, 2020 and will endeavour to respond to AGI as soon as practical thereafter.
- 34. The Debtors also assert the process to request documents under the DEFA Order is ineffective, time-consuming and very costly, and "ultimately did not produce the information that we will need for AGI to conduct its mandate". The Receiver notes that, prior to the AGI Request, the Debtors have not made any requests for documents or records pursuant to the DEFA Order since its prouncement on April 29, 2020. Two non-Debtors, Edson's and Brause, made a request for information under the DEFA Order in June, 2020, which searches produced 2 boxes of physical documents and approximately 4,000 electronic files (collectively, the "E/B Documents") that were responsive to the search criteria provided by Edson's and Brause. Further, the electronic records identified by this search were made available for Edson's and Brause within 10 days of the receipt of payment of \$11,602 (excluding taxes) related to the search costs for the search pursuant to the DEFA Order, which amount was paid by LTGLC (on behalf of Edson and Brause) under protest. The Receiver was not aware of any issues, nor did it receive any response or follow-up questionsfrom Edson's and/or Brause, with respect to the documents produced other than those now raised in the October 6 Fenske Affidavit. Separately, counsel for Edson's and Brause has followed up with a request for a process (as contemplated by the DEFA Order) to locate and copy "accounting records", and the Receiver has been responsive in endeavouring to put in place such a process.
- 35. In the September 29 Fenske Affidavit, Mr. Fenske states the "The DEFA process which has been in use for the past six months is dependent on keyword and other search criteria that are then applied to reports and records which have already been saved to the server." The Receiver asserts this statement is incorrect as, in the case of

the AGI Request, the information is being produced without the need of any keyword searches, given that the requested records are specifically identified.

Requests for Access to the Records

- 36. In the October 6 Fenske Affidavit, Mr. Fenske states the Debtors have been denied access to their data for over 6 months. Again as noted in paragraph 34 above, prior to the AGI Request, the Debtors had not submitted a request for information pursuant to the DEFA Order since its pronouncement on April 29, 2020.
- 37. In the NOM, the Debtors are seeking an Order of the Manitoba Court that permits a representative of Sandra L Fawcett Chartered Professional Accountant ("Fawcett") to have "read-only" access to the IT Systems to pull reports from any software and make copies of all data, including but not limited to emails and reports on the servers and computers to ensure (i) that Fawcett has copies of all records required in relation to the Debtors, other corporations and personal records, and (ii) compliance with all documents required to be produced with respect to any ongoing litigation, including but limited to, the subpoenas (the "Grand Jury Supoenas") issued by the US Attorney's Office for the Southern District of New York ("SDNY"). Further, throughout the Affidavits, Mr. Fenske asserts the Debtors and non-Debtors require access to the IT Systems and the records contained thereon to, among other things, assess their financial situation, make decisions and ensure the preservation of records in connection ongoing ligitation against the Debtors.
- 38. The Receiver notes the following comments with respect to the Debtors' requests for access to the Records:
 - (a) the proposed access sought by the Debtors is too broad in scope and the Debtors have not provided any information to the Receiver in terms of what reports/emails/documents they require other than what is contained in the AGI Request, which documentation has now largely been provided to the Debtors as noted above;
 - (b) in regard to compliance with the Grand Jury Supoenas, the Receiver notes that on or about February 25, 2020, the SDNY issued a Grand Jury Subpoena to Nygard, Inc., commanding the production of a wide range of documents and electronic files, to be produced by March 13, 2020. The Receiver understands through, discussions between Katten and the SDNY, that the Debtors did not provide production of any of the documents commanded by the SDNY, despite the Debtors having full access and control over the Records prior to the Appointment Date; and
 - (c) the Receiver understands based on discussions with certain Nygard IT staff that "read-only" access to all of the IT Systems may be difficult to coordinate in short-order as it would require establishing permissions

to all programs, some of which may not currently exist and/or the knowledgable Nygard staff is no longer employed by the Debtors. The Receiver further understands the "read-only" access referred in the September 29 Fenske Affidavit would only relate to the Debtors' accounting system but based on the NOM, the Debtors' have requested such access to all systems. Nygard IT staff also advised the Receiver that even if "read-only" access could be established across all systems on the IT Systems, it cannot be provided on a basis that is certain to preserve the integrity and security of the data contained thereon as there there could be risks that users with knowledge of architecture may be able to exploit the IT Systems.

- 39. As detailed in its Supplementary First Report dated April 27, 2020 (the "Supplementary First Report"), the Receiver noted that it had requested and received a report (the "File Deletions Logs") with a summary of file deletion activity by user on the Debtors' file servers since February 27, 2020. As noted in the Supplementary First Report, the user account identified as "Nygard.com\Greg Fenske GGF5140", which appears to be account belonging to Mr. Fenske (the affiant of the Affidavits), deleted a total of 1,059 files on March 18, 2020, between 8:44am CST and 6:37pm CST (the "Fenske File Deletion Log"). Based on a further review of the File Deletions Logs, the Receiver also noted that the account identified as "Nygard.com\Sabrina Agricola STA6914", which appears to the account belonging to the (now former) legal assistant to Mr. Abe Rubinfeld, (now former) general counsel to the Debtors, deleted a total of 101 files from the IT Systems between March 2, 2020 and the Appointment Date (the "Agricola File Deletion Log"). Since the Appointment Date, the Receiver understands Ms. Agricola has been retained by Edson's and Brause, and certain former executives of the Debtors, to assist with, among other things, a review of the E/B Documents, changes to the corporate registry of certain of the Debtors, and a walk-through of the Toronto Property to idenfify purported personal property belonging to Mr. Peter Nygard. Copies of the Fenske File Deletion Log and the Agricola File Deletion Log are attached hereto as Appendices "C" and "D", respectively.
- 40. The deletion activity is among a number of concerning transactions and activities completed by (now former) employees / executives of the Debtors prior to or shortly after the Appointment Date, and strengthens the Receiver's view that direct access to the IT Systems should not be granted to the Debtors, or their representatives, at this time.
- 41. However in order to facililate the Debtors review of the IT Systems and the data contained thereon, the Receiver contacted LTGLC (as well as Lerners LLP as counsel to Edson's and Brause) on October 7, 2020 to propose a potential solution in which Fawcett would be provided with supervised view-only access to the IT Systems (through use of Microsoft Teams software) but would have the ability to direct a representative of the Receiver/Nygard IT to conduct searches for the running of reports, view files, access specific folders, etc. The output of these searches would contemporaneously be seen on Fawcett's screen through Microsoft Teams but

there would be no ability to download documentation. Further the Receiver has suggested the searches be conducted on a single day and has allotted up to 7 hours for Fawcett to satisfy herself of what documents/files are available on the IT Systems. TDS is awaiting a response from LTGLC as to scheduling such access.

Inkster Property

- 42. The October 6 Fenske Affidavit contains a number of misleading statements by the Debtors pertaining to the sale of the Inkster Property and the Receiver's efforts in connection therewith. In paragraph 20 of the October 6 Fenske Affidavit, Mr. Fenske states the Receiver offered to sell the Inkster Property to the Debtors without any conditions other than price. TDS, on behalf of the Receiver, contacted LTGLC on September 18, 2020 and again on September 29, 2020 to inquire if Mr. Nygard or the Debtors had interest-in-purchasing the Inkster Property. The purpose of these communications was that, as the Receiver was in the process of negotiating and potentially finalizing the conditional offer received on the Inkster Property, the Receiver wanted to avoid potential arguments of "interest after the fact" similar to what was observed in connection with the sale of the Notre Dame Property. The Receiver notes TDS did not receive a response to either message sent to LTGLC other than the responses contained in the October 6 Fenske Affidavit. The Receiver further notes TDS also reached out to Lerners LLP to make the same inquiry of Edson's and Brause and were advised Edson's and Brause had no interest in the Inkster Property.
- 43. As correctly stated in the October 6 Fenske Affidavit, the Receiver had accepted a conditional offer (the "Inkster OTP") on the Inkster Property in May 2020. The conditions related to the Inkster OTP had not been waived or satisfied by the prospective purchaser until the evening of September 30, 2020. The Receiver had been in regular discussions with the prospective purchaser for the Inkster Property since early September 2020 in an effort to resolve the outstanding conditions on the Inkster OTP.
- 44. In the Brief, the Debtors appear to question the conduct of the Receiver in negotiating and finalizing the Inkster OTP despite the "Respondents' well known desire to restructure around the Inkster Property and the Broadway Property." The Debtors comment that, based on the statements contained in the Sixth Report of the Receiver dated August 3, 2020, the Debtors were of the belief that it appeared increasingly likely that there would be an opportunity for recovery to unsecured creditors and the Debtors began investigating their options for restarting a going concern business purportedly as a commercial real estate or third party logistics and distribution enterprise. However, the Receiver notes that as recent as September 16, 2020, the Debtors sought and received an Order of the Manitoba Court to withdraw the restructuring proceedings commenced by the Canadian Debtors through the filing of NOIs on March 9, 2020. The Receiver was completely unaware of any desire by the Debtors to restructure their business into a commercial real estate or third party logistics/distribution enterprise, until the

Receiver was made aware of the engagement of AGI on September 25, 2020 (the same date that the Receiver served its notice of the September 30 Motion) to "conduct a financial assessment of each entity". This occurred only five days before the conditions related to the Inkster OTP were waived, after months of negotiations with the prospective purchaser. The Receiver notes that the Debtors provide no evidence in their materials of their "well known" desire to restructure their business, let alone around the Remaining Winnipeg Properties as a commerical real estate or third party logistics and distribution enterprise. Further the Debtors were well aware that the Receiver was actively marketing the Remaining Winnipeg Properties, including the acceptance of a conditional offer on the Inkster Property and the Receiver's efforts to advance due diligence efforts with the prospective purchaser. Again, at no time did the Debtors advise the Receiver of their interest in the Inkster Property as noted above.

Document Transfer Motion

- 45. In the NOM, the Debtors assert that the time periods contemplated under the Document Transfer Order are unreasonable and state that the Receiver has proposed to provide the Debtors with 10 days to identify the Transferee that will take responsibility for the Redundant Records and then a further 15 days (the "Removal Period") to make arrangements to pickup the Redundant Records. The Receiver notes that the time periods are not concurrent and that the Removal Period would not commence until the Receiver provides written notice to the Transferee (if one is appointed), which would likely not occur until the closing of the sale of the Inkster Property. In any event, the Receiver is now proposing amendments to the draft Document Transfer Order, intended to condition the Document Transfer Order to the making of an Order approving the sale of the Inkster Property, and to accommodate the need to ensure that, in particular, the servers located at the Inkster Property will not be dismantled other than in accordance with a timetable directed by the Receiver to optimize the opportunity to preserve electronic records in the event of such a sale.
- 46. In the October 6 Fenske Affidavit and in the Brief, the Debtors asserts that the waiving of conditions on the Inkster OTP has created an urgency to deal with the matters raised in the Document Transfer Order that did not previously exist. The Receiver notes that the need to address the issues contemplated in the Document Transfer Order existed prior to September 30 (the date the Inkster OTP became a firm offer) due to the Receiver's anticipation of the sale of the Inkster Property and the Receiver's need to relinquish control of the Redundant Records, all of which was stated in the Eighth Report.

- 47. It is necessary to address matters relating to the transfer/abandonment/destruction of the Redundant Records at this time, to ensure that:
 - (a) timetables required for the copying and preservation of such records can be met;
 - (b) clarity can be achieved as what is to be done with the approximately 5000 boxes of physical documents and 344 terabytes of electronic files in connection with the discharge of all obligations of the Receiver's role in respect thereto; and
 - (c) third parties with a relevant interest in the preservation and production of some or all of the Records have an opportunity to request that the Manitoba Court consider and, if appropriate, make provision for their interests.
- 48. As will be discussed in greater detail in a subsequent report of the Receiver, the Receiver notes that the Inkster OTP contemplates closing would not occur until 60 days following the date on which the Receiver obtains an approval and vesting order of the Manitoba Court. The motion for an order approving the Inkster OTP and the granting of an approval and vesting order is scheduled to be heard by the Manitoba Court on November 9, 2020, meaning there are approximately 3 months to address issues related to the transfer of the Redundant Records.

Data Preservation

- 49. As stated in the Eighth Report, the Receiver intends to retain selected financial, payroll, human resource and other Records required for its administration and completion of the Receivership Proceedings, including Records required to review and assess the claims of unsecured creditors of the Debtors. Additionally, subsequent to its appointment, the Receiver retained KLDiscovery Inc. ("KLD"), a recognized expert in the areas of eDiscovery and data management, to assist with, among other things, creating a forensic copy (the "Forensic Copy") of the data saved to the IT Systems, as well as email data saved to the Debtors' email servers, so that the copied information could be accessed by the Receiver in the future, if required. The Receiver understands the Forensic Copy, once completed, will contain approximately 344 terabytes of information and in excess of 40 million records. The Receiver notes the Forensic copy will not contain information from the Nygard database servers, e-commerce servers or system, IT admin or disaster recovery servers, but rather just the "user-generated" files and email correspondence saved the Debtors' servers.
- 50. Subsequent to the September 30 Motion, the Receiver engaged in discussions with KLD to investigate options (the "Assessment of Data Access Options") for providing access to the various parties with interest in the preservation of Nygard data saved on the file servers in the event that the IT Systems/data cannot be preserved

or resurrected following dismantling of the servers and related equipment. Attached hereto as **Appendix "E"** is a copy of the Assessment of Data Access Options prepared by KLD, in consultation with the Receiver. On October 11, 2020, the Receiver provided counsel to the Debtors, Edson's, Brause, Louis Bacon and the "Jane Doe" action plaintiffs by email with a copy of the Assessment of Data Access Options. Attached hereto as **Appendix "F"** is a copy of the said email. Katten has been instructed to provide the Assessment of Data Access Options to the US Attorney for the SDNY in relation to the Grand Jury Proceedings.

51. Additionally, as a further option for the preservation and access to the IT Systems, the Receiver is also investigating options/costs to migrate some or all of the IT Systems to an offsite third-party host. This could enable remote access to the data and existing systems to be maintained notwithstanding the dismantling of the IT Systems, but would require potentially material upfront costs for the migration, and thereafter ongoing monthly hosting costs. This option may present the opportunity to preserve some or all of the IT Systems, albeit that in the circumstances, there may be only marginal benefit in preserving the ability to use the existing functional systems, as opposed to simply preserving the data. The Receiver will report further to the Manitoba Court once it has additional information on the feasibility and pricing of such an option.

V. UPDATE ON THE REMAINING WINNIPEG PROPERTIES

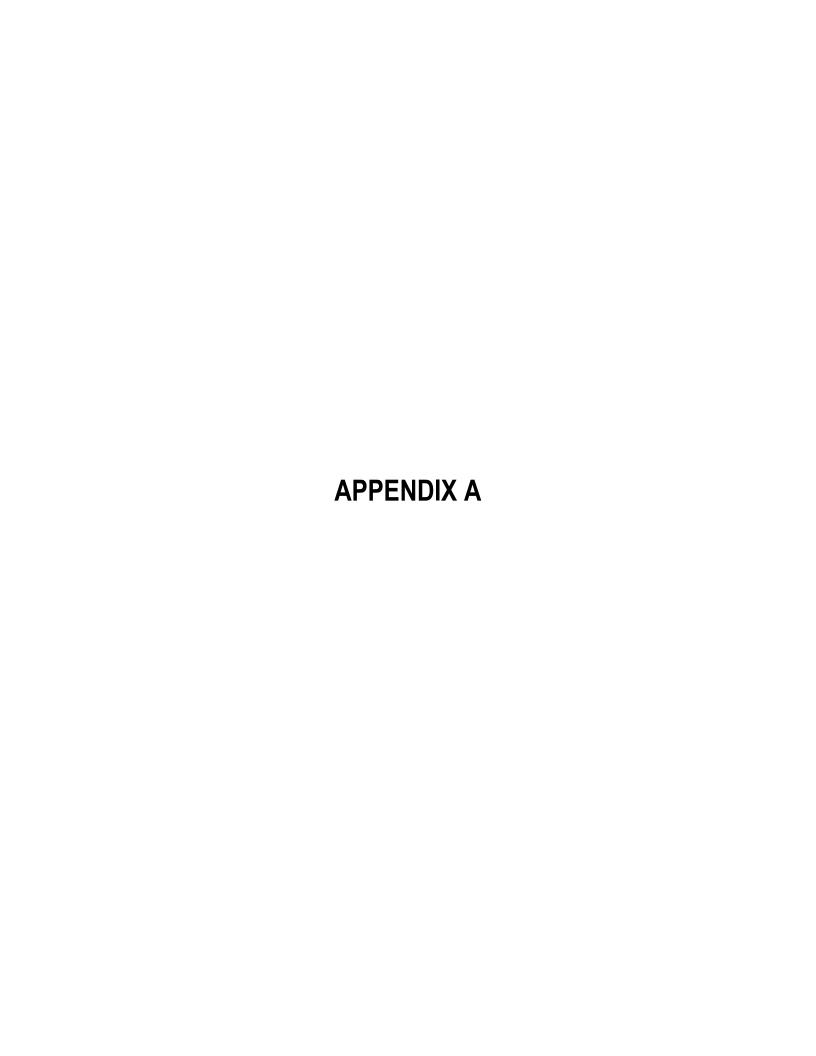
- 52. As in the noted Second Report of the Receiver dated May 27, 2020, the Receiver had accepted the Inkster OTP, which at the time contained a number of due diligence conditions in favour of the prospective purchaser. Since that time, the Receiver, in consultation with Colliers International ("Colliers") and TDS, has worked with the prospective purchaser to facilitate due diligence efforts to satisfy the conditions contained in the Inkster OTP.
- 53. As noted above, on September 30, 2020, the prospective purchaser for the Inkster Property waived the remaining conditions contained in the Inkster OTP. On October 1, 2020, the prospective purchaser delivered the second deposit (as defined in the Inkster OTP) to TDS. Following waiver of the prospective purchaser's conditions, the deposits paid pursuant to the Inkster OTP were non-refundable unless the Receiver failed to carry out its obligations under the Inkster OTP, including obtaining an approval and vesting order of the Manitoba Court. The hearing to consider a motion to be brought by the Receiver for an order approving the Inkster OTP is scheduled to be heard by the Manitoba Court on November 9, 2020.
- 54. On October 9, 2020, Colliers received a conditional offer to purchase (the "Broadway OTP") the Broadway Property. The acceptance period for the Broadway OTP expires at 5pm CT on October 14, 2020 after which the Broadway OTP will be null and void. The Receiver, in consultation with Colliers and TDS, is continuing to review the Broadway OTP and will report further to the Manitoba Court, as appropriate, if the Broadway OTP is accepted and the relevant conditions contained therein are are satisfied or waived by the potential purchaser.

All of which is respectfully submitted on this 12th day of October, 2020.

Richter Advisory Group Inc.
in its capacity as Receiver of
Nygard Holdings (USA) Limited, Nygard Inc., Fashion Ventures, Inc.,
Nygard NY Retail, LLC, Nygard Enterprises Ltd., Nygard Properties Ltd.,
4093879 Canada Ltd., 4093887 Canada Ltd., and Nygard International Partnership
and not in its personal capacity

Adam Sherman, MBA, CIRP, LIT

Pritesh Patel, MBA, CFA, CIRP, LIT



Archived: Monday, October 12, 2020 11:51:44 AM

From: Bruce Taylor

Sent: Sun, 4 Oct 2020 16:22:52

From: Bruce Taylor To: "Wayne M. Onchulenko" CC: Domenico Magisano, Ross McFadyen, Melanie LaBossiere Subject: FW: Nygard Receivership

To: Wayne M. Onchulenko

Cc: Domenico Magisano; Ross McFadyen; Melanie LaBossiere

Subject: FW: Nygard Receivership - document matters [LAW-TDS.FID1853952]

Importance: Normal

Wayne,

- in response generally to electronic record access/preservation issues:
- it remains the understanding of the Receiver that, once the servers located in the Inkster building are dismantled, it is unlikely that they can generally be set up and "plugged in" at another location without loss of functionality, which creates the risk of loss of (or loss of access to) electronic records. The Receiver understands that your clients agree with this analysis
- the servers will need to be dismantled and removed from the Inkster building to accommodate a sale of the Inkster building. We can now confirm that the conditional sale of the Inkster building first described in the Second Report of the Receiver dated May 27, 2019, has been finalized. That is, conditions (other than as to Court approval) of the Purchaser have been satisfied or waived. The Purchase Agreement remains conditional on Court approval. The Receiver is obliged to take steps to seek Court approval, which the Purchase Agreement requires be obtained on or before November 16, 2020. We will now seek a date for the hearing of a motion to approve the sale. Given the indications from Justice Edmond as to his schedule, we do not expect such a motion to be scheduled until late October/early November. If approved, the closing date of the sale is 60 days following Court approval. In the result, subject to Court approval of the Inkster sale, there is a period of approximately 3 months available to address issues regarding the preservation of electronic files prior to the expected dismantling of the servers.
- as we described to the Court on September 30 (and as we described to you prior to Sep 30), the Receiver is investigating the opportunity to copy the files saved on the Nygard file servers system. The Receiver is expecting to have more detailed information on this process on Tuesday Oct 6, however, it is the Receiver's current understanding that (i) in the range of 37 million files would be copied in this process, representing user-generated files currently saved on the system, (ii) that, while it is the intention of the Receiver to have a forensic image of these files made for the Receiver's purposes (i.e. to preserve a "pristine" copy of these records), a further copy (including documents, records and electronic files currently saved on the system, for the period up to March 17, 2020, can be made, at the Debtors' cost, to be provided to the Debtors. The present approach would be that this copy for the Debtors/non-Debtors would essentially include all documents, records and electronic files (other than email) that are saved to the Nygard system up to and including March 17, 2020. This presumably would enable access to available relevant documents for litigation production purposes. It is the Receiver's present understanding that the cost to the Debtors of obtaining such a copy would be in the range of USD50,000-70,000 (including hardware costs) per copy. It is also the Receiver's understanding that the copy that could be made available to the Debtors (and/or others) (together with the copy of the emails described below) would include copies of "all of the documents", which is what you are currently asking to review
- in addition, as we described to the Court on September 30 (and as we described to you prior to Sep 30), the Receiver is investigating the opportunity to copy all "@nygard.com" email currently stored in Office 365. The Receiver is expecting to have more detailed information on this process by October 9, 2020, but presently understands that this process will take up to 3 weeks to complete and will include perhaps millions of emails. Again, it is the Receiver understanding that a copy of the email data currently on the Nygard system for the period up to and including March 17, 2020 could be made available to the Debtors, at the Debtors' cost. The Receiver does yet not have estimates of the cost. Again, it is the Receiver's understanding that this "copy" would enable access to relevant email correspondences, for litigation production purposes.
- because of the intermingled manner in which the "Nygard Organization" conducted business and managed its records, the copies of user-generated files/emails would include records that are Debtor records and "non-Debtor" records". "Non-Debtor" records includes what you have referred to as "personal" records. It would be the Receiver's understanding that the copies of the user-generated records and email data acquired by the Debtors, would be intended to be accessed, through the Debtors, by Debtors and non-Debtors
- copies of the user-generated records and email data can include only materials that are saved to the system. The Receiver is aware that certain electronic records were deleted from the system (e.g. on March 18, 2020). The Receiver has no way of knowing whether, or to what extent, records relevant to any particular litigation or production obligation may have been deleted from the system prior to the appointment of the Receiver.
- As we advised both you and the Court, the Receiver is investigating these processes. Copies have not yet been made, and will not be made until arrangements regarding these matters are confirmed by Court order. Once those matters are addressed, and assuming the Receiver's understandings are confirmed by the further information it expects to receive next week, the Receiver presently estimates that it will take 4-6 weeks for these copies to be created.
- As to your comments in green below, please see our specific responses, in all capitals, so that they are distinguishable.

G. Bruce Taylor P 204-934-2566

C 204-295-5241

From: Bruce Taylor Sent: Saturday, October 3, 2020 2:41 PM

To: 'Wayne M. Onchulenko' <WOnchulenko@ltglc.ca>

Cc: Domenico Magisano <dmagisano@lerners.ca>; Bryan Gelman <bgelman@albertgelman.com>

Subject: RE: Nygard Receivership - document matters [LAW-TDS.FID1853952]

Wayne, we are available from 9:30 to 3:30 central time on Monday. Please let us know what works for you.

I'll respond more fully to your "green" comments below in due course, which will include a response to the request in your message directly below, to "start sending the materials you have agreed to produce, today?", which, respectfully, completely ignores what we have said to you.

Regards

G. Bruce Taylor

C 204-295-5241

From: Wayne M. Onchulenko < WOnchulenko@ltglc.ca>

Sent: Saturday, October 3, 2020 2:07 PM

To: Bruce Taylor < GBT@tdslaw.com>

Cc: Domenico Magisano dmagisano@lerners.ca: Bryan Gelman bgelman@albertgelman.com

Subject: Fwd: Nygard Receivership - document matters [LAW-TDS.FID1853952]

We understand it was difficult for you to not be available for a call today on short notice.

What time do you think will work Monday? The morning would be better for us.

Can you start sending us the material you have already agreed to produce, today? We will then be able to address any shortcomings on a timely basis.

Thank you for your anticipated cooperation.

Wayne

Begin forwarded message:

From: Bruce Taylor < GBT@tdslaw.com Date: October 3, 2020 at 11:43:45 AM CDT To: "Wayne M. Onchulenko" < WOnchulenko@ltglc.ca>

Cc: Domenico Magisano dmagisano@lemers.ca, Bryan Gelman bgelman@albertgelman.com

Subject: Re: Nygard Receivership - document matters [LAW-TDS.FID1853952]

\u-257 ?

Wayne, we are not able to arrange a call this weekend. We are looking into whether a call on Monday will work, and will get back to you.

Get Outlook for iOS

From: Wayne M. Onchulenko < WOnchulenko@itglc.ca>

Sent: Friday, October 2, 2020 10:33:19 PM

To: Bruce Taylor < GBT@tdslaw.com>

Cc: Domenico Magisano dmagisano@lerners.ca; Bryan Gelman bgelman@albertgelman.com

Subject: Fwd: Nygard Receivership - document matters [LAW-TDS.FID1853952]

Hi Bruce

Please see below in green.

Does sometime between 3:30 and 5 work for a call?

Wayne M Onchulenko*

<image001.png>

700-330 St. Mary Avenue | Winnipeg, MB R3C 3Z5

204 957.6402 v

204 957 1696 1

Bar Admissions: Manitoba, Ontario and Nunavut

* Services provided through Wayne M. Onchulenko Law Corporation

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A please think green before printing this email

From: Bruce Taylor < GBT@tdslaw.com>
Sent: October 1, 2020 11:44 PM

To: Wayne M. Onchulenko <u>WOnchulenko@ltglc.ca</u>>

Cc: Domenico Magisano dmagisano@lerners.ca; Ross McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Ross McFadyen ROSS McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Ross McFadyen magisano@lerners.ca; Ross McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Ross McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Ross McFadyen magisano@lerners.ca; Ross McFadyen magisanow; Ross McFadyen <a href="magisa

Subject: RE: Nygard Receivership - document matters [LAW-TDS.FID1853952]

Wayne, please see below in red.

Regards

G. Bruce Taylor

P 204-934-2566

C 204-295-5241

From: Wayne M. Onchulenko <WOnchulenko@ltglc.ca>

Sent: Thursday, October 1, 2020 11:00 PM

To: Bruce Taylor < GBT@tdslaw.com>

Cc: Domenico Magisano dmagisano@lerners.ca; Ross McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Ross McFadyen RAM@tdslaw.com; Melanie LaBossiere MML@tdslaw.com; Melanie MM

Subject: RE: Nygard Receivership - document matters [LAW-TDS.FID1853952]

Hi Bruce

I have received your email late this evening. I disagree with your description of our requests. You have recorded excerpts from the motion which are less clear. The motion read together makes it clear what we want. The lists are taken directly from the Notice of Motion and the Fenske affidavit.

By way of example, is it your position you do not know that all relevant documents have to be produced in litigation? The point we are making is that fulfilling your request for "all documents that are relevant" does not identify what you want, because that does not tell us which documents are relevant. We are also making the point that it is unlikely that Sandra Fawcett would, in any event, be able to know which documents are relevant, identify and locate them.

We require full access to review all of the documents so we can identify those that are relevant. Sandra Fawcett is not being engaged as an individual to complete this process. Sandra's firm will have access to the required resources from the former Nygard Management team who are familiar with the records and my firm. Albert Gelman Inc is working in parallel as an additional trusted resource to work with Richter to insure the integrity of the process.

MILLION FILES AND POTENTIALLY MILLIONS OF EMAILS. IT IS NOT CLEAR THAT "READ ONLY" ACCESS IS AVAILABLE FOR ALL THE RECORDS ON THE FILE SERVERS
OTHER THAN ACCOUNTING RECORDS UNDER THE 'AX' PROGRAM. ONCE COPIES OF THE USER-GENERATED FILES AND EMAIL DATA ARE ACQUIRED BY THE DEBTORS
(AS PER OUR COVERING MESSAGE ABOVE), YOUR CLIENTS (AND NON-DEBTORS) COULD THEN TAKE SUCH STEPS TO IDENTIFY RELEVANT DOCUMENTS FOR
LITIGATION PRODUCTION PURPOSES AND CONDUCT SUCH OTHER REVIEWS AS YOUR CLIENTS (AND NON-DEBTORS) SEE FIT.

YOUR MOTION MATERIALS MAKE NO REFERENCE TO ACCESS BY SANDRA FAWCETT'S FIRM OR "THE FORMER NYGARD MANAGEMENT TEAM".

Similarly, your reference to "copies of all records required in relation to the respondents, other corporations and personal records" is unclear, because you do not define what you mean by "required" (i.e. documents required for what?) or give any indication of which documents and files are the ones that are "required". We are suggesting that it is unlikely that Sandra Fawcett would know what is intended by this request (that is, it is unlikely she would be able to know what "records are required in relation to the respondents, other corporations and persona records") or that she would have sufficient familiarity with the IT system and files to be able to locate and identify those documents.

As outlined in our motion, we want to assure ourselves we are in possession of the documents required to satisfy the document preservation orders. The Accounting and Insolvency firms, working in conjunction with former Nygard Finance and IT Management, must be allowed supervised access to the documents.

YOUR MOTION MATERIALS MAKE NO REFERENCE TO A REQUEST FOR THE ACCOUNTING AND INSOLVENCY FIRMS AND 'FORMER NYGARD FINANCE AND IT MANAGEMENT, TO BE ALLOWED ACCESS TO THE DOCUMENTS.

This process can be made more efficient if we are allowed access to review the documents Richter has already made copies of.

WE HAVE BEEN CLEAR THAT THE RECEIVER IS REVIEWING OPPORTUNITIES TO COPY AND THEREBY PRESERVE USER-GENERATED ELECTRONIC FILES AND EMAIL DATA. AT NO TIME HAVE WE SUGGESTED THAT THE RECEIVER HAS "ALBEADY MADE COPIES". THE PROPOSAL OF THE RECEIVER IS THAT, SUBJECT TO CONFIRMATION TO THE RECEIVER OF THE VIABILITY OF THE PROCESSES THAT THE RECEIVER IS INVESTIGATING, AND SUBJECT TO COURT ODDER, THE DEBTORS (AND NON-DEBTORS) WOULD HAVE THE ABILITY TO OBTAIN (AT THEIR COST) A FURTHER COPY OF THOSE USER-GENERATED ELECTRONIC AND EMAIL DATA (CURRENTLY ON THE SYSTEM, UP TO MARCH 17, 2020), SUBJECT TO THE LIMITATIONS DESCRIBED IN OUR COVERING MESSAGE ABOVE.

These are the kinds of matters we want to discuss with you in the call we have suggested for tomorrow, to see what might be possible to achieve in the circumstances.

Do I correctly understand you will be providing the information you have listed you can before the case conference on Thursday morning without charge? What our message says to you is that, subject to a proper request being made under the DEFA Order, and subject to the payment of the costs/expenses required by the DEFA Order for the required search time and copying, the Receiver expects that the documents we have identified in our message can be provided by mid to late next week. Justice Edmond clearly emphasized the need to comply with the DEFA Order.

The requested documents can be discussed in 3 groups.

The first group is the financial data. Some of it already exists, such as the tax filings, and some of which must be generated from AX by the Nygard CFO and his team. Richter's incremental costs for this data is likely minimal and should be provided free of charge.

The second group of data is emails and files required to fulfill the document preservation orders. The bulk of this data may be satisfied by you providing a copy of all of the files you have already copied. Again any charge for this should be minimal as there is no search required.

Once we have obtained copies and reviewed the second group of data, we can assess the gaps by reviewing the data you have chosen to not copy. Therefore we must be involved in the search of the existing data and again Richter will only have to copy not search

SEE OUR ANSWER IMMEDIATELY ABOVE

If not please advise why not? Clearly, it takes some time to locate, and copy the files and documents that we have indicated the Receiver believes can be produced. At the moment, the Receiver expects that time period to be sometime by mid to late next week. If there is a charge what is the charge and why? As you know, there are costs contemplated under the DEFA Order that are required to be paid by the parties requesting the searches.

We understand the production of the financial data will take time however it must be provided to us as it is produced not delivered as a single batch at the end (i.e. Preferably at a time specific schedule. One example would be daily documents need to be delivered by 2pm, which will result in follow up questions returned by 3pm, with required answers by 4pm.)

The financial data can begin to be produced and delivered on Saturday October 3. As outlined earlier there is no searching required for this data and the labour to produce the reports is relatively small to the Receiver.

YOUR TIMETABLE IS NOT ACCEPTABLE. AS WE HAVE ADVISED YOU, ALL ACCESS TO THE DOCUMENTS LISTED BY BRYAN GELMAN WILL BE SUBJECT TO THE DEFA ORDER AND PAYMENT OF ASSOCIATED COSTS. IT IS THE RECEIVER'S UNDERSTANDING THAT THE DOCUMENTS FROM THE GELMAN LIST THAT THE RECEIVER HAS INDICATED THE ABILITY TO PROVIDE, WILL TAKE APPROXIMATELY 60 HOURS TO OBTAIN/GENERATE, AND, SUBJECT TO PROMPTLY RECEIVING A DOCUMENT ACCESS REQUEST THAT YOUR CLIENTS ACKNOWLEDGE TO BE MADE UNDER THE DEFA ORDER (AND SUBJECT TO PROMPT PAYMENT AS REQUIRED BY THE DEFA ORDER), THE DOCUMENTS CAN BE PROVIDED BY MID TO LATE NEXT WEEK.

It is too late to attempt to arrange a meeting for tomorrow today. I will attempt to arrange the meeting tomorrow moming. I may not be able to arrange a meeting on such short notice. If we are able to arrange the meeting we will answer any questions you have and confirm which of our requests you are prepared to produce and when you will produce the material. We have already confirmed to you what it appears can be provided in regard to the list of materials and informationthat you have said Bryan Gelman says he would like to review. We are not in agreement with your statement "appears can be provided" by midweek to latest Friday October 9. But this schedule would not allow us to be ready for the Case Conference on October the 8th. To be

ready by this date we must begin to receive the data Saturday October 3 and be completed by Tuesday October 6.

THERE IS NO NEED FOR YOU TO RECEIVE DOCUMENTS BY THE OCT 8 CASE CONFERENCE. IF ARRANGEMENTS ARE THEN IN PLACE AS TO ACCESS TO THE "GELMAN DOCUMENTS". JUSTICE EDMOND CAN BE ADVISED ACCORDINGLY.

With a enough experienced Nygard team members assigned to this project, I am told the Financial reports requested by Bryan Gelman can be completed according to the schedule above by Tuesday October 6.

YOUR INFORMATION IS INCORRECT, AND THIS IS NOT THE ONLY WORK THAT NEEDS TO GET DONE BY NYGARD EMPLOYEES.

DEFA requirements (although not in the exact format) have already been met in a new list provided by Bryan Gelman in Greg Fenske's affidavit. This new request format can be easily executed by the Nygard Team.

DEFA REQUIREMENTS HAVE NOT BEEN MET. JUSTICE EDMOND CLEARLY REINFORCED THE NEED TO PROCEED PURSUANT TO THE DEFA ORDER, AND THE RECEIVER IS NOT PREPARED TO PROCEED IN RESPECT OF THE "GELMAN DOCUMENTS" OTHER THAN IN CIRCUMSTANCES WHERE IT IS CLEAR THAT THE REQUEST IS MADE (AND WILL BE PAID FOR) UNDER THAT ORDER

As to the other items you list, there needs to be a discussion about those matters. We do not know what the Receiver will be able to confirm to you, or when such confirmation could be given.

There is an order from the US Courts to preserve all the files outlined in the existing subpoenas (which were also served on the Receiver) You have already confirmed that the Receiver has created the document copies required to satisfy the subpoena requirements as they understand them. We will ask the Judge to issue an Order requiring that we receive copies of these documents if we have not already received them.

RESPECTFULLY, WHAT IS THE POINT OF THIS? YOU HAVE NOT MADE ANY KIND OF MOTION FOR AN ORDER OF THE TYPE YOU DESCRIBE ABOVE, AND THE STIPULATION ORDER IN THE US PROCEEDINGS ADDRESSES THIS. IT IS OUR UNDERSTANDING THAT COPIES OF THE DOCUMENTS/MATERIALS PROVIDED TO THE US ATTORNEY HAVE ALREADY BEGUN TO BE PROVIDED TO YOUR OFFICE AND MR. MAGISANO'S OFFICE IN ACCORDANCE WITH THE STIPULATION ORDER.

As you know we have been trying to get copies of our files for the past 6 months and we are dissatisfied with the results obtained through the DEFA process according to your terms and we have received less than 5% of the needed files. In view of the fact you were looking for court permission to abandon the servers that contain our files on Wednesday September 30, and you have stated the fragile state of these computers and that they are at the end of their life, we fail to see how any further delays can make sense.

THE DEFA ORDER WAS MADE ON APRIL 29, 2020. SINCE THAT DATE, THERE HAVE BEEN **NO** SEARCH REQUESTS SUBMITTED BY ANY OF THE DEBTORS. SO, YOUR CLIENTS HAVE MADE **NO** EFFORTS TO OBTAIN ACCESS TO DOCUMENT SINCE THE MAKING OF THE DEFA ORDER. THE "5%" REFERENCE APPEARS TO HAVE BEEN PULLED OUT OF THE AIR.

THE ONLY SEARCH REQUESTS THAT HAVE BEEN MADE, WERE MADE BY EDSON'S/BRAUSE. THOSE REQUESTS WERE FULLY RESPONDED TO. E/B WERE PROVIDED WITH LINKS TO 2 SEPARATE SITES CONTAINING DOCUMENTS RESPONSIVE TO THEIR SEARCH CRITERIA (WHICH INCLUDED MORE THAN 60 SEARCH TERMS WHICH EDSON'S AND BRAUSE REQUESTED BE LARGELY LIMITED TO SEARCHES OF ABE RUBINFELD'S EMAIL). A TOTAL OF 3,956 ELECTRONIC FILES WERE PROVIDED. PHYSICAL FILES WERE ALSO PROVIDED.

Our responsibility to the Courts is to preserve our complete documents history. This requirement does not allow us identify 'document by document' through the DEFA process which copies we get and which we will not get.

AS DESCRIBED ABOVE, THE RECEIVER IS INVESTIGATING PROCESSES BY WHICH SAVED USER-GENERATED FILES, AND SAVED EMAIL CORRESPONDENCES, WOULD BE PRESERVED.

Thank you for indicating what you are prepared to produce.

Wayne M Onchulenko*

<image001.png>

700-330 St. Mary Avenus | Winnipag, MB R3C 3Z5

204 957.6402 v

Bar Admissions: Manitoba, Ontario and Nunavut

* Services provided through Wayne M. Onchulenko Law Corporation

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Sent: October 1, 2020 8:38 PM To: Wayne M. Onchulenko < WOnchulenko@ltglc.ca> Cc: Domenico Magisano domenico Magisano domenico Magisano.ca Subject: Nygard Receivership - document matters [LAW-TDS.FID1853952] Wayne, A. The following are the document access requests described in the Notice of Motion which you filed on Tuesday: 1. "copies of all records required in relation to the respondents, other corporations and personal records" "all documents required to be produced with respect to any ongoing litigation" 3. "a copy of the "User Generated Electronic Files" "..documents (or copies of documents) ... related to any litigation involving the respondents, Peter Nygard and/or any other employees of the respondents" Your request 1 gives no indication of what records you are referring to, and does not indicate what "other corporations" and whose "personal records" you are seeking. The amount of data on the servers is massive, and it cannot be that you are suggesting that Sandra Fawcett would be able to review that data and somehow identify the broad scope of whatever it is that you are requesting. Requests 2 and 4 seem to the same thing, however, the Receiver has no idea what documents are required to be produced in any litigation. It does not appear to us that Sandra Fawcett would have any better idea. Your wording includes requests for debtors, non-debtors and "personal records". As Justice Edmond indicated, there is a document access process set out in the Documents and Electronic Files Access Order (the "DEFA Order") that is to be followed. However, to try to move this process forward, without limiting the need for appropriate records search requests under the DEFA Order, the Receiver is suggesting that a call be arranged involving Sandra Fawcett, you, the Receiver, the CFO from Nygard and our office, to discuss these matters further. Would you be able to arrange with Sandra that she participate in a call sometime between 12:30 and 2:30 ET tomorrow (Friday)? On such a call, we can give you an update on the Receiver's efforts regarding copying the User Generated Electronic Files and the email data. B. The following are the documents described in Fenske's affidavit, which you advise have been requested by Bryan Gelman: Current chart of accounts Current detailed trial balance 6. 7. Detailed trial balance reports as at year end for each of the previous 5 fiscal years Detailed GL report showing all posted transaction for each of the previous 5 fiscal years 8. Corporate tax returns for each of the previous 5 years For any/all intercompany accounts, detailed GL reports showing all transactions for the previous 5 years Where there were transactions with related entities outside of the Corporate Group, detailed GL reports from those entities showing all transactions between each of them and the entities comprising the Corporate Group

Current aged accounts payable listing

Externally produced financial statements for the previous 5 years

12.

14. Current aged accounts receivable listing

- 15. 3 most recently prepared bank reconciliations
- Most recent notice of (re)assessment from CRA with respect to both HST and corporate income taxes.

The Receiver has spoken to the Nygard team, and can advise that, subject to your clients providing appropriate records search requests in accordance with the DEFA Order, the Nygard team is able to provide by mid to late next week, the following:

- 5. Current chart of accounts
- Current detailed trial balance
- 7. Detailed trial balance reports as at year end for each of the previous 5 fiscal years
- 9. Corporate tax returns for each of the previous 5 years
- 12. Externally produced financial statements for the previous 5 years
- 13. Current aged accounts payable listing
- 14. Current aged accounts receivable listing
- 16. Most recent notice of (re)assessment from CRA with respect to both HST and corporate income taxes.

For the remaining 4 items, only subsets of the requested information can be produced, which should, nevertheless, be sufficient for the purposes of assessing the viability of undertaking an NOI process:

- Detailed GL report showing all posted transaction for each of the previous 5 fiscal years
- this is a massive amount of data. For the prior years, completed financial statements (#12) and tax returns (#9) are already being provided. For current year, the detailed trial balance is being provided. Not sure why more detail is needed, if the purpose is to determine whether a viable proposal can be filed? If absolutely required, Nygard could produce for all entities other than NIP for the periods Feb-19 to Jan-20 and Feb-20 to Current Date.
- 10. For any/all intercompany accounts, detailed GL reports showing all transactions for the previous 5 years
- again, this is a massive amount of data. See point above.
- 11. Where there were transactions with related entities outside of the Corporate Group, detailed GL reports from those entities showing all transactions between each of them and the entities comprising the Corporate Group
- If non-Debtors have requests for information, they should make a request under the DEFA Order.
- 15. 3 most recently prepared bank reconciliations
 - · Most recent can be provided, that should be all that is needed.

Please consider the matters described under the heading "B" above, provide appropriate records search requests under the DEFA Order, and the Receiver can proceed.

As per the DEFA Order, there will be costs required to be paid in connection with the search requests arising under both A and B above, which can be detailed assuming we go forward.

Regards

Partner

G. Bruce Taylor

P 204-934-2566 C 204-295-5241 F 204-934-0506 E gbt@tdslaw.com/gbt

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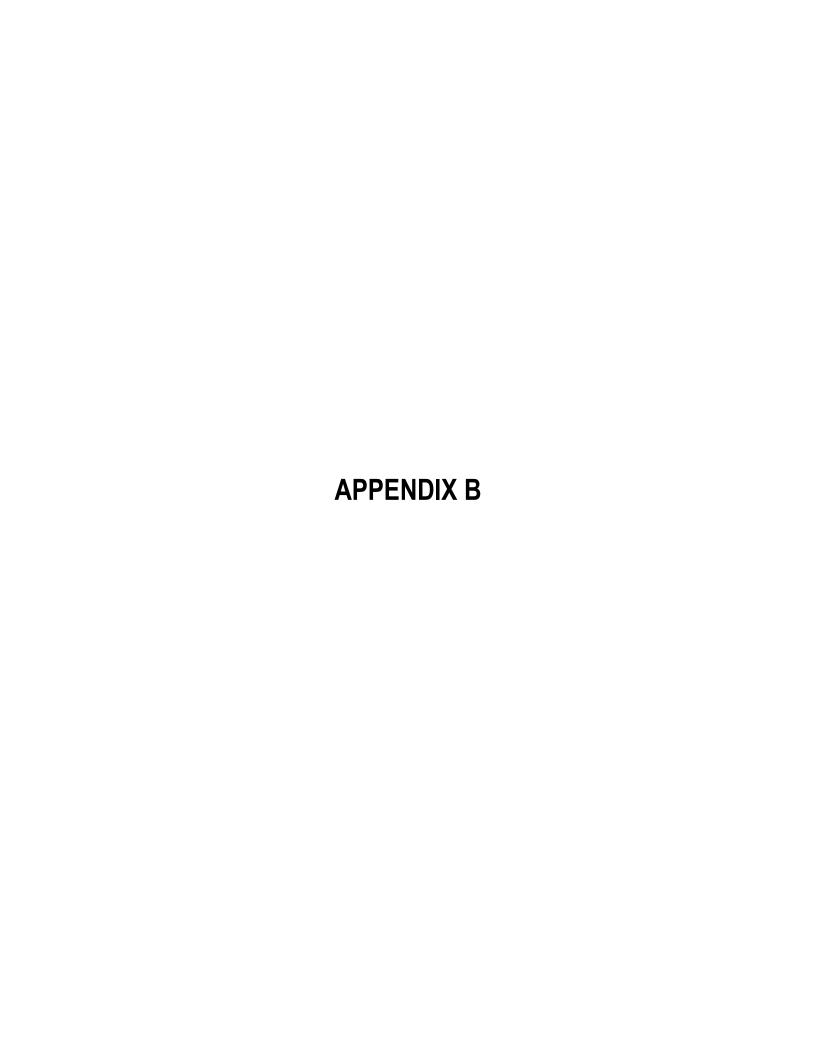
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From: Bruce Taylor

Sent: Friday, October 9, 2020 5:05 PM

To: 'Wayne M. Onchulenko' < WOnchulenko@ltglc.ca>

Cc: Ross McFadyen <RAM@tdslaw.com>; Melanie LaBossiere <MML@tdslaw.com>

Subject: Nygard Receivership - Gelman documents [LAW-TDS.FID1853952]

Wayne, the "Gelman documents" which the Receiver indicated it would produce, have been uploaded to a dataroom, accessible through the following link:

Password:

The Receiver notes generally that the requested files have been prepared by Nygard accounting staff based on historical accounting practices and the Receiver has not audited or otherwise attempted to verify the accuracy or completeness of the information. The Debtors' books and records do not appear to include the entire population of potential claims including lease rejection claims from landlords, claims pursuant to the Landlords' Charge, employee claims (for vacation pay, severance, termination, as applicable), claims for goods in transit, certain Lender claims, expenses incurred but not accrued and others.

We also attach the Receiver's invoice for the production of these documents.

Regards,

G. Bruce Taylor

Partner

- P 204-934-2566
- C 204-295-5241
- F 204-934-0506
- E gbt@tdslaw.com
- W tdslaw.com/gbt

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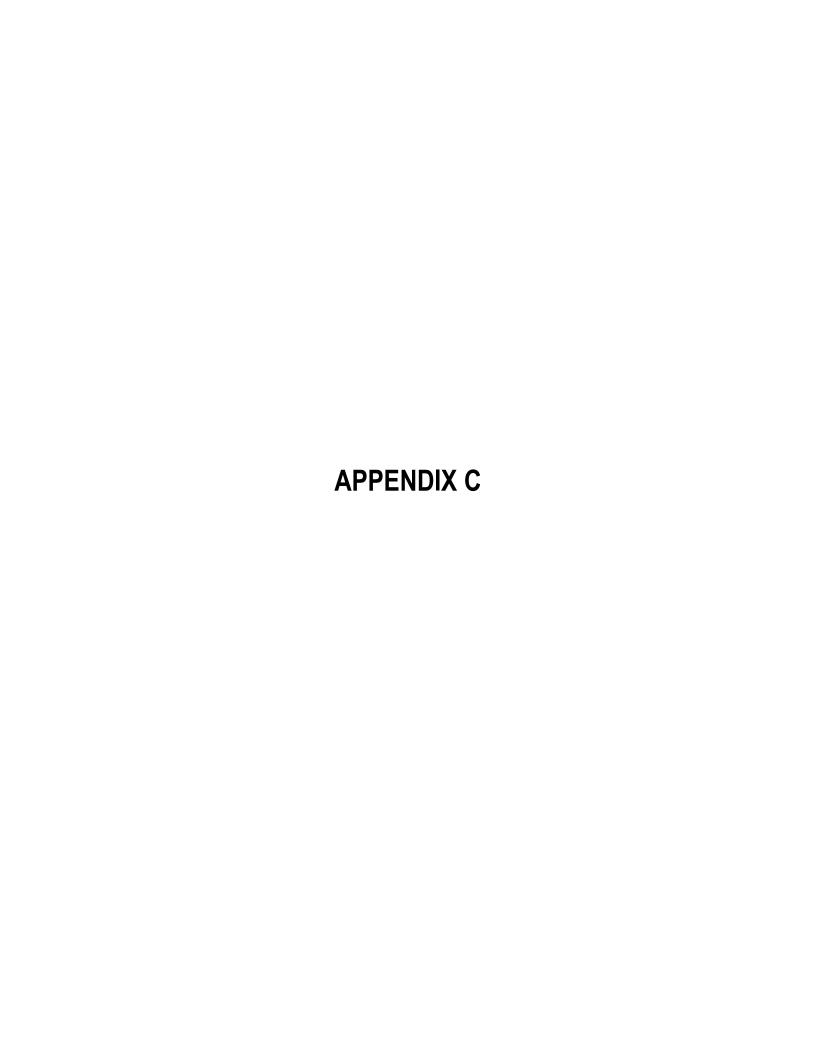


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2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	CGL - China Logistics; Global Perspective.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Freight module	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Maple Freight Ltd. International Freight Forwarder.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Freight module	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Paradigm Global Logistics - A Pacific CMA Company® - global air, ocean freight and logistics provider.url	F:\Data\Personal\GGF\personal\Favorites\Freight module	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	IATA Global Price Analysis.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Aviaton fuel	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Plane Simple Powered by Satcom Direct.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Aviaton fuel	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	VP-BPZ 🛣 FlightAware.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Aviaton fuel	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Spot Price for Gulf Coast Jet Fuel.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Aviaton fuel	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Jet Fuel Prices at LAX LOS ANGELES CA LOS ANGELES INTL Airport Jet Fuel Prices.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Aviaton fuel	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Windows Marketplace.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Links	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Windows.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Links	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Fenske - snow tires - SEP27 2019.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	t778-13e.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	jassy vick - 2261 2262 - NOV.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Fenske - INS cancelation - FEB 20.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	saan.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140		F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Procard.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
	Nygard.com\Greg Fenske GGF5140	mgmnt list SEP22 2013.xls	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140		F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
	Nygard.com\Greg Fenske GGF5140	TimeSheet.url		File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140		F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00				File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Nygard Vista.url ShowMe.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Google.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Microsoft Dynamics ERP and CRM Business Solutions.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	National Retail Federation - Information Technology News.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Merchant Services Canada US Credit Card Processing PSiGate Merchant Accounts.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Welcome Tender Retail.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Winnipeg Free Presss.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Homepage Oltis Systems Corporation.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140		F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Air Canada - JUL28 Receipt - Baggage Fee.txt	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140		F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
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2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard.Com.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg F - Annual - PMT FRI JUN3 2016.msg	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Cheri - Contacts - May 2018.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg Fenske - chiro - FEB9 2019.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Blackberry - Allocation - Agreement.msg	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Vehicle Report for GREGORY FENSKE.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	mgmnt list SEP26 2016.xls	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg Fenske - Passport - 2019.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	BB details.xls	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Microsoft Dynamics Convergence Atlanta 2014.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Welcome to World Airport Codes.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	ACE User Community.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	CustomerSource Microsoft Dynamics Customer Resources.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Inside Microsoft Dynamics AX - Site Home - MSDN Blogs.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
	Nygard.com\Greg Fenske GGF5140	Welcome to Merchant Applications.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00			F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	AX Rpts - Report Manager.url	i . (Data (i Cisonal (GG) (personal (i avorites (i avorites	
	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	AX Rpts - Report Manager.url Encore Business Solutions - Microsoft Dynamics GP and AX Reseller and Microsoft Dynamics GP ISV.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00				
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Encore Business Solutions - Microsoft Dynamics GP and AX Reseller and Microsoft Dynamics GP ISV.url	F:\Data\Personal\GGF\personal\Favorites\Favorites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Encore Business Solutions - Microsoft Dynamics GP and AX Reseller and Microsoft Dynamics GP ISV.url FW Associate injury incident form - Greg Fenske - 12172018.msg	F:\Data\Personal\GGF\personal\Favorites\Favorites F:\Data\Personal\GGF\personal	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Encore Business Solutions - Microsoft Dynamics GP and AX Reseller and Microsoft Dynamics GP ISV.url FW Associate injury incident form - Greg Fenske - 12172018.msg finance - staff - moms GIC.msg Vista.url Company Profile.url	F:\Data\Personal\GGF\personal\Favorites\Favorites F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00 2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Encore Business Solutions - Microsoft Dynamics GP and AX Reseller and Microsoft Dynamics GP ISV.url FW Associate injury incident form - Greg Fenske - 12172018.msg finance - staff - moms GIC.msg Vista.url	F:\Data\Personal\GGF\personal\Favorites\Favorites F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153

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2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg F - Q2 QB - AMT.msg	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	mgmnt list OCT22 2016.xls	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	ETICKET - GREG F - JUL28.rtf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg Fenske - chiro - SEP29 2018.pdf	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Greg F photo.JPG	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Andrew G AUG 2016.msg	F:\Data\Personal\GGF\personal	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard Report Manager-url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	FedEx Canada.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Purolator Courier Ltd.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	MAI Release Notes.Ink	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Purolator.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	ICS.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	IE site on Microsoft.com.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Welcome to IE7.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Microsoft At Work.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Microsoft At Home.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	IE Add-on site.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Marketplace.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Microsoft Websites	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	ICSPAL.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygård Travel System.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:57:00-05:00	Nygard.com\Greg Fenske GGF5140	Fashion at your fingertips - NYGÅRD.url	F:\Data\Personal\GGF\personal\Favorites\Favorites\Nygård International	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO - Terms and Conditions Final - MAR 2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Finance - ePO - terms and conditions .msg	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - VENDOR ACK - NOV20-13 Unsecure.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions - APPR ANT - JUL6-2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - VENDOR ACK - NOV20-13.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - VENDOR ACK - NOV20-13.docx	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions Final - MAR17 2015.docx	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions - Current - JUL6 2017.docx	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of JUL 2017	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions - ePO - MAY6.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of JUL 2017	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Nygard shipment Ctr. UACU8138502 Expected delivery to Vaughan Warehouse May 2 2019 Our File TBA.msg	G:\Data\Platinum\AX\Greg F\2019 Container Ship Fire	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - Current - JUL6 2017.docx	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of JUL 2017	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - ePO - MAY6.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of JUL 2017	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions Final - DKW - MAY21 2013.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chan	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions Final - KJG - OCT27-06.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chan	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - Ken G Revision - JUN9-03.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chang	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	SUPPLIER AQC Policy - Ken G Revision - JUN7-04.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chang	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	default.htm	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chan	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions Pending - JUN9 2015.docx	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO - Terms and Conditions - Final JUL6-2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions Final - MAR17 2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy	
2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PO Terms and Conditions - Pending - JUL6-2015.docx	G:\Data\Platinum\AX\Greg F\AQC policy	File deleted 125.110.99.153 File deleted 125.110.99.153
	Nygard.com\Greg Fenske GGF5140	Nygard - SUPPLIER Terms and Conditions - OCT30-2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of OCT30 2015	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - SUPPLIER AQC Policy - OCT30-2015.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\PROD as of OCT30 2015	
2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	QCPolicy.htm PO Terms and Conditions Final - KJG - JUN9.pdf	G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chang G:\Data\Platinum\AX\Greg F\AQC policy\AQC policy 2013 David Walsh Chang	
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	nygard-50th-book-spreads.pdf	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	FW PDC - SHOW - LIGHTINGVIDEO COST terms.msg	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	50th - Events by Emma - Cost.msg	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard 50th - SEP 2018 - Budget PJN APPR.xls	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	RE PDC - SHOW - LIGHTINGVIDEO COST SEP 2018.msg	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Water Bottles JAN29.msg	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PMO - Intake form - Sample.msg	G:\Data\Platinum\ax\Greg F\Antonio\IT Tools	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PMO - Resource Planning - Sample tools.msg	G:\Data\Platinum\ax\Greg F\Antonio\IT Tools	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	PMO - Project Prioritization - Sample tool .msg	G:\Data\Platinum\ax\Greg F\Antonio\IT Tools	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	RE FIN - CONF CENTRE - historical costs.msg	G:\Data\Platinum\AX\Greg F\50th anniversary	File deleted 125.110.99.153
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2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	Alexa M - Travel NOV5-16 - PJN APPR.msg	G:\Data\Platinum\AX\Greg F\Alexa M	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	Expense Report Form- TRVL -AXM 1116.pdf	G:\Data\Platinum\AX\Greg F\Alexa M	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	ANC-Jackets- shipping method .msg	G:\Data\Platinum\ax\Greg F\Arts Crafts	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Air shipment to Nygard KA - Neel SEP7.msg	G:\Data\Platinum\ax\Greg F\Arts Crafts	File deleted 125.110.99.153
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		Expense Report Form-TRVL -AXM 1116 - FINAL.pdf	G:\Data\Platinum\AX\Greg F\Alexa M	File deleted 125.110.99.153
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2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\Alexa M	File deleted 125.110.99.153
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2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00				
2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Alexa McMillan -Design invoice NOV18 2018.pdf NOV - Design help - REQ OCT23.msg	G:\Data\Platinum\AX\Greg F\Alexa M G:\Data\Platinum\AX\Greg F\Alexa M	File deleted 125.110.99.153
2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Alexa McMillan -Design invoice NOV18 2018.pdf NOV - Design help - REQ_OCT23.msg NYGÅRD - IT Summit - Follow up.pptx	G:\Data\Platinum\AX\Greg F\Alexa M G:\Data\Platinum\AX\Greg F\Alexa M G:\Data\Platinum\AX\Greg F\Antonio	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00 2020-03-18T11:58:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Alexa McMillan -Design invoice NOV18 2018.pdf NOV - Design help - REQ OCT23.msg NYGÄRD - IT Summit - Follow up.pptx Bill of Sale- NIP - Template.docx RE NYGARD - MIRAGE - PMTS due NOV16.msg	G:\Data\Platinum\AX\Greg F\Alexa M G:\Data\Platinum\AX\Greg F\Alexa M G:\Data\Platinum\AX\Greg F\Antonio G:\Data\Platinum\AX\Greg F\Antonio	File deleted 125.110.99.153 File deleted 125.110.99.153 File deleted 125.110.99.153

2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH\ACH	File deleted 125.110.99.153
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2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH\ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH\ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
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	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\Cluster Adjuster G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO Deposit Edge	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - Payroll CAD - test file ACHTAPE_PC300.txt	G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - EFT - CAD payroll test file MAR6.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE ftp error .msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Nygard - EFT - AP CAD.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\EFT ACH	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC\Prober Forebarence	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	re Peter Nygard - Direction to Pay - AUG10 2018 BMO CFM.msg	G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Peter Nygard - Direction to Pay - AUG10 2018.msg	G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NYGARD - MIRAGE - PMTS due bank details.msg	G:\Data\Platinum\ax\Greg F\BMO private banking	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	BBC - OCT19 - Weekly.msg	G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC\Prober Forebarence	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO BBC	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\connectivity	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\Wire G:\Data\Platinum\AX\Greg F\BMO file conversion\connectivity	File deleted 125.110.99.153 File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\connectivity	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00 2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\connectivity	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion\connectivity	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	FW VIVIANA - Statement on 11 May 2018.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Carla - Outstanding Payments - Settlement APR5.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153

2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Carla - Outstanding Payments - Settlement APR10.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Carla - Outstanding Payments - Settlement APR11.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	FW VIVIANA - Statement on 8 jun 2018.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
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2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Carla - Outstanding Payments - Settlement APR11.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	答复 Carla - Outstanding Payments - Settlement.msg	G:\Data\Platinum\ax\Greg F\Carla	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RANKING TABLES - BOTTOMS - UPDATED WED7.msg	G:\Data\Platinum\AX\Greg F\Buying Tables	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Slims - Buying Tables - REV JUN7-17.xls	G:\Data\Platinum\AX\Greg F\Buying Tables	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	ADX - Ranking Tables - PLS Revise Dillards MAY26.msg	G:\Data\Platinum\AX\Greg F\Buying Tables	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NYGARD International Partnership # 4000323815 - bank details A.msg	G:\Data\Platinum\AX\Greg F\CHEP pallets	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Chep Pallets - app form - Sept 23 2016.msg	G:\Data\Platinum\AX\Greg F\CHEP pallets	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NYGARD International Partnership # 4000323815 - bank details.msg	G:\Data\Platinum\AX\Greg F\CHEP pallets	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	NYGARD International Partnership # 4000323815 account details.msg	G:\Data\Platinum\AX\Greg F\CHEP pallets	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NYGARD International Partnership # 4000323815 copntact details.msg	G:\Data\Platinum\AX\Greg F\CHEP pallets	File deleted 125.110.99.153
2020-03-18111:59:00-05:00 2020-03-18T11:59:00-05:00		Blair SOW - 506710 - Nygard International - Third Party Software Planning and Upgrade - V7R2 - June 20 2017 - Revised July 19 2017.p		File deleted 125.110.99.153
	Nygard.com\Greg Fenske GGF5140			
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Finance - BMO - EFTACH value dates.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - BMO - EFTACH value dates.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard ach fraud prevention.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	nygard connectivity.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US payroll - version 1 MAY15.txt	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	nygard olbb.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	SDC PROTECT Email Customer Guide Page.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	nygard check debit block.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard ACH.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	NYGARD TAX PAY.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard Wire Transfer.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Harris Bank	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - Connectivity - options Sebastian JAN18.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - Connectivity - options Teresa JAN30.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	NYGARD INTERNATIONAL PARTNERSHIP-20170203 142.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nyagrd - SecureFTP_SSL_questionnaire - JAN 31 2017.doc	G:\Data\Platinum\AX\Greg F\BMO file conversion	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	cachet - Vincent contract - 2014.pdf	G:\Data\Platinum\AX\Greg F\Cachet	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Finance - ePO - Vincent.msg	G:\Data\Platinum\AX\Greg F\Cachet	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	pos instructions.odt	G:\Data\Platinum\AX\Greg F\Cachet	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	O&A-AUG7.xlsx	G:\Data\Platinum\AX\Greg F\Cachet	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.7M CAD \$1.5M drawdown - DEC1919 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - US\$ 1.8M CAD \$3M drawdown - SEP2519 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 3M CAD \$1.2M drawdown - OCT119 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
				File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.5M CAD \$2.5M drawdown - OCT1719 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Sears Shops - Cluster ADJ Plan - Update.msg	G:\Data\Platinum\AX\Greg F\Buying Tables\Cluster Adjuster	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - US\$ 1.6M CAD \$1.3M drawdown - NOV2119 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 2M CAD \$3.3M drawdown - DEC2719 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.5M CAD \$1.5M drawdown - DEC1219 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - US\$ 1.5M CAD \$2M drawdown - NOV719 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	BMO - NYGARD - draw down REQ OCT17 2019.pdf	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - US\$ 1.2M CAD \$2.2M drawdown - NOV1419 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.5M CAD \$2M drawdown - NOV719 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 3.5M CAD \$3M drawdown - OCT1019 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 700K CAD \$4M drawdown - OCT2419 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.5M CAD \$3M drawdown - NOV2819 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - US\$ 1.6M CAD \$1.3M drawdown - NOV2119 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - US\$ 3.5M CAD \$3M drawdown - OCT1019 .msg	G:\Data\Platinum\AX\Greg F\BMO Draw down	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - Cheque layout - BNS version.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Cheque	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - BMO - Cheque blanks.msg	G:\Data\Platinum\AX\Greg F\BMO file conversion\Cheque	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - Cheque Order details - BNS version.pdf	G:\Data\Platinum\AX\Greg F\BMO file conversion\Cheque	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NYGARD - MIRAGE - PMTS due SEP1919 short pmt to Art B.msg	G:\Data\Platinum\AX\Greg F\BMO private banking\2019	File deleted 125.110.99.153
2020-03-18T11:59:00-05:00	Nygard.com\Greg Fenske GGF5140	FW NYGARD - MIRAGE - PMTS due SEP1919 - Art Brothers short payment SEP.msg	G:\Data\Platinum\AX\Greg F\BMO private banking\2019	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	DS X-Dock - IT Requirements - Status update.msg	G:\Data\Platinum\ax\Greg F\Drop Ship Project 2019	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_NOV15-18_NOV15-19_111419.xls	G:\Data\Platinum\ax\Greg F\Container history report\NOV_2019	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail NOV15-18_NOV15-19_111419.xls	G:\Data\Platinum\ax\Greg F\Container history report\NOV_2019	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Denis L - NM Payables - FEB10.xlsx	G:\Data\Platinum\ax\Greg F\Denis L	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW New Vendor Set Up - Everwin - Forms Policy Docs.msg	G:\Data\Platinum\ax\Greg F\Denis L	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00 2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW 2018 Freight rates - forwarder - cost saving FEB8 .msg	G:\Data\Platinum\AX\Greg F\Container history report	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00 2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Five 2018 Freight rates - forwarder - cost saving FEB8 .msg Finance - Fuji - arbitration.msg	G:\Data\Platinum\AX\Greg F\container history report G:\Data\Platinum\AX\Greg F\ePO Expenses	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Finance - Fuji INVC - current charges.msg	G:\Data\Platinum\AX\Greg F\ePO Expenses	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Cash Flow - Open PO - OCT07.xlsx	G:\Data\Platinum\AX\Greg F\ePO Expenses	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ePO - Trade Show - Instructional 2 .PNG.msg	G:\Data\Platinum\AX\Greg F\ePo Canton Fair	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ePO - Trade Show Creation - Instructional 1 .PNGs.msg	G:\Data\Platinum\AX\Greg F\ePo Canton Fair	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Finance - ePO - Trade Show connectivity .msg	G:\Data\Platinum\AX\Greg F\ePo Canton Fair	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RMT 23997 - Mockup.xlsx	G:\Data\Platinum\AX\Greg F\ePo Canton Fair	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Fabric PO - SHG vendors - Weekly with revisions.xlsx	G:\Data\Platinum\AX\Greg F\ePO fabric orders	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Fabric PO - SHG vendors - 4 week.xlsx	G:\Data\Platinum\AX\Greg F\ePO fabric orders	File deleted 125.110.99.153
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Fabric PO - SHG vendors - Week20141201.xlsx	G:\Data\Platinum\AX\Greg F\ePO fabric orders	File deleted 125.110.99.153

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2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	New Fabric SPECS - Mill INFO - Blank Form.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - Trade Fair PO - main menu.pdf
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - ePO created Canton Fair - MAY11 2015.xlsx
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE PJN - TRAVEL - CHINA APRIL 2014.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - Trade Fair PO - main menu.log
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Fabric PO SHG vendors - 4week - From Week20141208.xlsx
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	Fabric PO - SHG vendors - NOV10-16.xlsx
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW revised proposal - 30 day payment.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Change of Payment Terms for Canada Shipment Dan c Ahileas T.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard Agreement banking details CFM.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - D J - Company name and banking update.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - D J - Company name and banking update banking.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	MRCH - D&J - PO update.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Change of Payment Terms for Canada Shipment to PJN.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - D J - Company name and banking update JAN22.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Change of Payment Terms for Canada Shipment BRUCE H.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Change of Payment Terms for Canada Shipment Original.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - D J - Company name and banking update CFM from D&J.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - D J - Company name and banking update JAN29.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Change of Payment Terms for Canada Shipment FRI5 to DJL.msg
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ePO - vendor priority - JUN7.xlsx
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _JUN01-19_AUG21-19_082219.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _JAN01-18_FEB01-19_020719.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_JAN01-18_FEB01-19_020719.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _OCT01-15_MAY26-16_052616.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _JUN1-14_NOV30-14_120814.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_DEC01-14_SEP30-15_100715.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_JAN10-17_AUG31-17_090317.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _MAY27-16_JAN09-17_010917.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _JAN10-17_AUG31-17_090317.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_NOV01-16_MAR31-18_052318.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_MAY27-16_JAN09-17_010917.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_OCT01-15_MAY26-16_052616.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_JUN1-14_NOV30-14_120814.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_MAY27-12_MAY25-13_060514.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _DEC01-14_SEP30-15_100715.xls
2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail _NOV01-16_MAR31-18_052318.xls
2020-03-18T12:00:00-05:00 2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	ContainerInfo_Detail MAY27-12 _MAY25-13_060514.xls ePo - Priority Controls - JUN3 2019.xml
2020-03-18T12:00:00-05:00 2020-03-18T12:00:00-05:00	Nygard.com\Greg Fenske GGF5140	ContainerHeaderInfo_JUN01-19_AUG21-19_082219.xls
2020-03-18T12:00:00-05:00 2020-03-18T12:01:00-05:00	Nygard.com\Greg Fenske GGF5140	Executive Flight - OCT18 to FLA - CFM.pdf
2020-03-18T12:01:00-05:00	Nygard.com\Greg Fenske GGF5140	RE CHARTER - BAHAMAS TO FT LAUDERDALE - OCT18 CFM.msg
2020-03-18T12:01:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Invoice - CHARTER - BAHAMAS TO FT LAUDERDALE - OCT18.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Re 500 unit - T-shirt - HT JUN11.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Re 500 unit - T-shirt - HT JUN12.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Re 500 unit - T-shirt - HT JUN8.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Re 500 unit - T-shirt - HT JUN19.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	RE 500 unit - T-shirt - HT JUN11 print placement.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	RE 500 unit - T-shirt - HT JUN7.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	FW 50th Anniversary T-Shirt - 500 pcs - Status MAY24.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	RE 500 unit - T-shirt - HT JUN13.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2009 to 2011.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2012 to 2014 with 2012 NOT restated.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	finance - fiscal cal reset - status.xls
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	CALENDAR - Nygard 2013 2017.xls
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2006 to 2008.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2012 to 2014 with 2012 restated.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	RTL Fiscal Year- Month start and end - Final.xlsx
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	finance - JAN FEB MAR APR ending date - revised calender.xlsx
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2015 to 2017.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	2012 to 2014.pdf
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	finance - JAN FEB MAR ending date - revised calender.xlsx
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	RTL Fiscal Year- Month start and end - Hans G.xlsx
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - fiscal year - start and end dates.xls
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	FW RTL Calendar - 2014-16 - Example.msg
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - Fiscal Calendar reset - Work sheet.xls
2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - Instructions for resetting JAN14 ME - Greg F.xls
2020-03-18T12:02:00-05:00 2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	finance - JAN FEB MAR APR MAY ending date - revised calender.xlsx RE FTM - MAY18 - Committee Review .msg
2020-03-18112:02:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	FTM - Recommendations - WK DEC29.msg
2020-03-18T12:02:00-05:00 2020-03-18T12:02:00-05:00	Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140	Standard rent run - due 1st of month - test file.txt
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2020-03-18T12:04:00-05:00	Nygard.com\Greg Fenske GGF5140	Process Document - Wire Fee Payment Method.doc	G:\Data\Platinum\AX\Greg F\Ideaca emails	File deleted 125.110.99.153
2020-03-18T12:04:00-05:00	Nygard.com\Greg Fenske GGF5140	Create UST US template company and create legal entity DRAFT v2.xls	G:\Data\Platinum\AX\Greg F\Ideaca emails	File deleted 125.110.99.153
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	Nygard.com\Greg Fenske GGF5140	Fwd Nygard - payment history - 90 days.msg		
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2020-03-18T12:07:00-05:00	Nygard.com\Greg Fenske GGF5140	Re 7 8 U roofs need replacement - total cost \$ 276500.00 - PJN approval	G:\Data\Platinum\AX\Greg F\Midwest Roofing LASC	File deleted 125.110.99.153
2020-03-18T12:07:00-05:00	Nygard.com\Greg Fenske GGF5140	BAH RTL - duty invc - AUG14.pdf	G:\Data\Platinum\AX\Greg F\Mall at Marathon BAH	File deleted 125.110.99.153
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2020-03-18T12:07:00-05:00	Nygard.com\Greg Fenske GGF5140	Mall at Marathon corrected Invoice # 36096 IMPORTANT new invc with VAT.msg	G:\Data\Platinum\AX\Greg F\Mall at Marathon BAH	File deleted 125.110.99.153
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2020-03-18T12:07:00-05:00	Nygard.com\Greg Fenske GGF5140	SLIMS_ CriticalPath_2Q18_MAY - JUN - JUL.xls	G:\Data\Platinum\AX\Greg F\Mensana Project\SLIMS critical paths	File deleted 125.110.99.153
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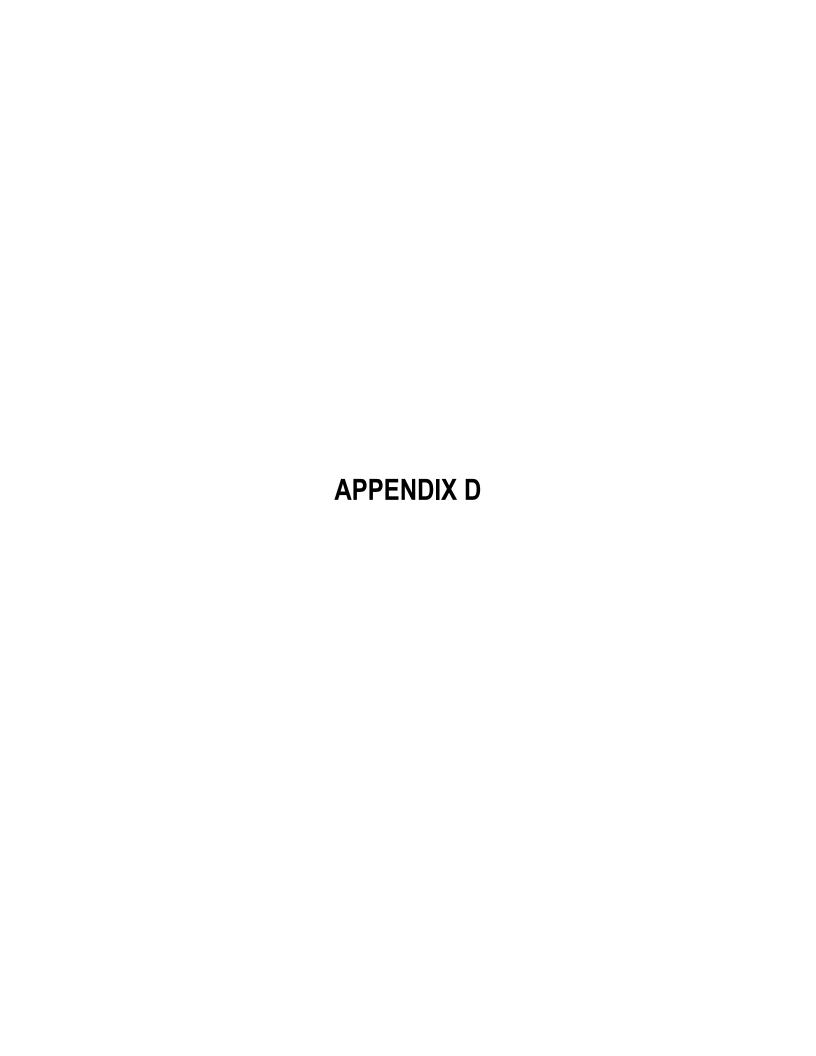
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2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 PDC MAR 15 - Finance - COMP Presentation Greg F.ppt G\Data\Platinum\AX\Greg F\PDC MAR 2015 File deleted 125.110.99. 2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 G\Data\Platinum\AX\Greg F\PDC MAR 2015 File deleted 125.110.99. 2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 Nygard.com\Greg Fenske GGF5140 G\Gata\Platinum\AX\Greg F\PDC MAR 2015 File deleted 125.110.99.	
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2020-03-18112:13:00-05:00 Nygard.com/Creg Fenske GGF5140 PDC - FIN CAL - Picture.xis Gi/Data/Platinum/Ax\(Greg F/PDC SEP 2015 File deleted 12-5:110-99.	
2020-03-1812:3:00-05:00 Nygard.com/corg Felise GoF5140 Fluid celetal [25:110:95 G/Data/Platinimin/A/Greg F/PDC SF 2015 File deleted [25:110:95 Fluid celetal [25:110:95 Flu	
2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 AQC - Policy - Summary.xlsx G:\Data\Platinum\AX\Greg F\PDC SEP 2015 File deleted 125.110.99.	
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2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 PO - Non AS400 - Since APR 14.xlsx G:\Data\Platinum\AX\Greg F\PDC SEP 2015 File deleted 125.110.99.	.153
2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 PRES-Template-BlueWide.ppt G:\Data\Platinum\ax\Greg F\PDC SEP 2017 File deleted 125.110.99.	.153
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2020-03-18T12:13:00-05:00 Nygard.com\Greg Fenske GGF5140 CO PRES - Cost Control - SEP-17.msg G:\Data\Platinum\ax\Greg F\PDC SEP 2017 File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Tarryn Skuy - INVC 47363662 - JAN9 2017.pdf G:\Data\Platinum\AX\Greg F\Robert Half - the Creative Group File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Finance - Shlomi H - Summary.msg G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 RE Finance - Shlomi H - Summary with invc and work plan pdf.msg G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	
2020-03-18112:14:00-05:00 Nygard.com/Creg Fenske GGF5140 Invoice DEC - 2014.pdf G/Data/Platinum/Ax/Greg F/Shlomi H File deleted 125:110-99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg F\Sales report AX File deleted 125.110.99.	
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2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Gruen Search - Invoice 2577 - Stacy R.doc G:\Data\Platinum\ax\Greg F\Recruiting Fees File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 FW Invoice 3313 from Patty Shapiro Associates Incmsg G:\Data\Platinum\ax\Greg F\Recruiting Fees File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 NM NF - Sample Sewer - MIS JUN14 - 2018.xlsx G:\Data\Platinum\ax\Greg F\PreProd File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fhreke GGF5140 NF - PRE PROD - COMP RECOM JUN6 2018 DJL.xlsx G:\Data\Platinum\ax\Greg F\PreProd File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 document2015-08-12-111620.pdf G:\Data\Platinum\AX\Greg F\Sears SLIMS File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Sears - SLIMS Shops - Completion Dates.msg G:\Data\Platinum\AX\Greg F\Sears SLIMS File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 FW NM - Gruen Agency - Stacy R.msg G:\Data\Platinum\ax\Greg F\Recruiting Fees File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Finance - Petro Canada History MAYS 2015.xlsx G:\Data\Platinum\AX\Greg F\Petro Canada File deleted 125.110.99.	
2020-03-1812-14-00-05:00 Nygard.com/Greg Fenske GGF5140 QBonus - Q3 2014 - PIN Approved.xls G/Qata/Platinum/AX/Greg F/Shlomi H File deleted 12-5.110-99.	
2020-03-1812-14:00-05:00 Nygard.com/Greg Fenske GGF5140 File deleted 125-110-95 G/Data/Platinim/(AX/Greg F/Shlomi H G/Data/Platinim/(AX/Greg F/Shlomi H G/Data/Platinim/(AX/Greg F/S	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Finance - Shlomi H - INVC history.xlsx G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Invoice febuary - 2015.xls G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Finance - Shlomi H - DEC and FEB INVC and FEB work plan.pdf G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 FW Shlomi associate End of contract.msg G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 Finance - ePO - Shlomi H PMTS.rtf G:\Data\Platinum\AX\Greg F\Shlomi H File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 FW Finance - Shlomi H File deleted 125.110.99.	.153
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 SD VP-BPZ SwiftBroadband Plans.msg G:\Data\Platinum\AX\Greg F\SatCom File deleted 125.110.99.	
2020-03-18T12:14:00-05:00 Nygard.com\Greg Fenske GGF5140 NForce - SatCom - bulk purchase.xls G:\Data\Platinum\AX\Greg F\SatCom G:\Data\Platinu	
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2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - Shlomi H - PO summary APR28.xlsx	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	NYGÅRD Purchase Order Issued - GGF3368908 - NForce - Satcom internet access - bulk purhcase.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Enabling Wi-Fi Security for the Aviator.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW VP-BPZ SB-200 Service Plans Ref00820176 2.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE VP-BPZ SB-200 Service Plans Ref00820176 2.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
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2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - VP-PBZ - billing options JUL 15.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - VP-PBZ - billing options Ref00820266 APR3 to Satcom.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Nygard - VP-PBZ - PO AUG18 2016.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Important Notice for Swift 64 and SwiftBroadband.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Inmarsat Terms and Conditions.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FEB-2015 WORKING PLANN.pdf	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Attendance - Final Shlomi H - APR6-2015.xlsx	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW feb 15-working plan invoice.msg	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	31344 - Employment contract - Copy (dated AUG22-14).pdf	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Invoice febuary - 2015.pdf	G:\Data\Platinum\AX\Greg F\Shlomi H	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE VP-BPZ SwiftBroadband Plans AUG2 2016.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Satcom Direct NEWS.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE VP-BPZ SwiftBroadband Plans Ref03800105.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Finance - SatCom - use history.xlsx	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Satcom Direct account for Enterprise Aviation Ref0284000389.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Satcom Direct - Account reconcilation - Review APR4 2016.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - VP-PBZ - billing options 2015.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	monthly usage.bmp	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Enterprise SB200 VP-BPZ - 7 2016 Final.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
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2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	plans.bmp	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
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2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Re SwiftBroadband Notification - Ron S - LGA use by crew.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Satcom Direct Activation for Enterprise Aviation Tail # VP-BPZ.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Terms-and-Conditions-for-In-Flight-Wireless-Communications-Services.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Plane Simple User's Guide 4 2013.pdf	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Satcom summary.xls	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Satcom Direct Account VP-BPZ OCT10.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Credit Memo from SD - VPBPZ Ref01154693 CM APR5 2016.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW SBB Rate Plan Change Confirmation VPBPZ Ref01666819.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Re VP-BPZ SwiftBroadband Plans JUL 13 2016.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Skyshield Activation Confirmation VP-BPZ (3).msg	G:\Data\Platinum\AX\Greg F\SatCom\Sky Shield Filters	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE Nygard - VP-PBZ - billing options Ref00820266.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE VP-BPZ SB-200 Service Plans Ref00820176.msg	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140		G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	Shortcut to Finance - SatCom - use history.xlsx.lnk	G:\Data\Platinum\AX\Greg F\SatCom	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	MKTG - Photo Studio - upgrade costs first draft.xlsx	G:\Data\Platinum\AX\Greg F\Photo Studio upgrade	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	RE NFN - Studio Upgrade - Order details.msg	G:\Data\Platinum\AX\Greg F\Photo Studio upgrade	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW NFN - Studio Upgrade - cost REV for APPR order details.msg	G:\Data\Platinum\AX\Greg F\Photo Studio upgrade	File deleted 125.110.99.153
2020-03-18T12:14:00-05:00	Nygard.com\Greg Fenske GGF5140	FW NFN - Studio Upgrade - PJN APPR.msg	G:\Data\Platinum\AX\Greg F\Photo Studio upgrade	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	INC - Trial Balance - 2015.pdf	G:\Data\Platinum\AX\Greg F\YE Audit 2016\Trial Balances	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	879 - Trial Balance - 2015.pdf	G:\Data\Platinum\AX\Greg F\YE Audit 2016\Trial Balances	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	CO - Trial Balance - 2015.pdf	G:\Data\Platinum\AX\Greg F\YE Audit 2016\Trial Balances	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	Stingray - Services Agreement - MAY24 2017 o.pdf	G:\Data\Platinum\AX\Greg F\Stingray Music	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	FW Stingray - moving fwd - SDH Q.msg	G:\Data\Platinum\AX\Greg F\Stingray Music	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	Stingray - Services Agreement - MAY24 2017.pdf	G:\Data\Platinum\AX\Greg F\Stingray Music	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	pn_plus_size_060515_3.xlsx	G:\Data\Platinum\AX\Greg F\SLIMS focus group	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	RE SLIMS - PLUS sizes - focus group JUL13.msg	G:\Data\Platinum\AX\Greg F\SLIMS focus group	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	bn_plus_size_060515_3.xlsx	G:\Data\Platinum\AX\Greg F\SLIMS focus group	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	Outstanding Statement- Swish Model Management- July 27th 2017.msg	G:\Data\Platinum\AX\Greg F\Swish	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	Outstanding invoices 14.msg	G:\Data\Platinum\AX\Greg F\Swish	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	2013-07-30 Nygard Liability Worksheet ANT modified.xlsx	G:\Data\Platinum\AX\Greg F\Vincent output	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	JE CAAT Data Request Letter_Nygard - MAR 2016 - 879.docx	G:\Data\Platinum\AX\Greg F\YE Audit 2016	File deleted 125.110.99.153
2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	JE CAAT Data Request Letter_Nygard - schedule D.docx	G:\Data\Platinum\AX\Greg F\YE Audit 2016	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	JE CAAT Data Request Letter_Nygard - MAR 2016 - NYC.docx	G:\Data\Platinum\AX\Greg F\YE Audit 2016	File deleted 125.110.99.153
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2020-03-18T12:15:00-05:00	Nygard.com\Greg Fenske GGF5140	JE CAAT Data Request Letter_Nygard - MAR 2016 - NHU.docx	G:\Data\Platinum\AX\Greg F\YE Audit 2016	File deleted 125.110.99.153
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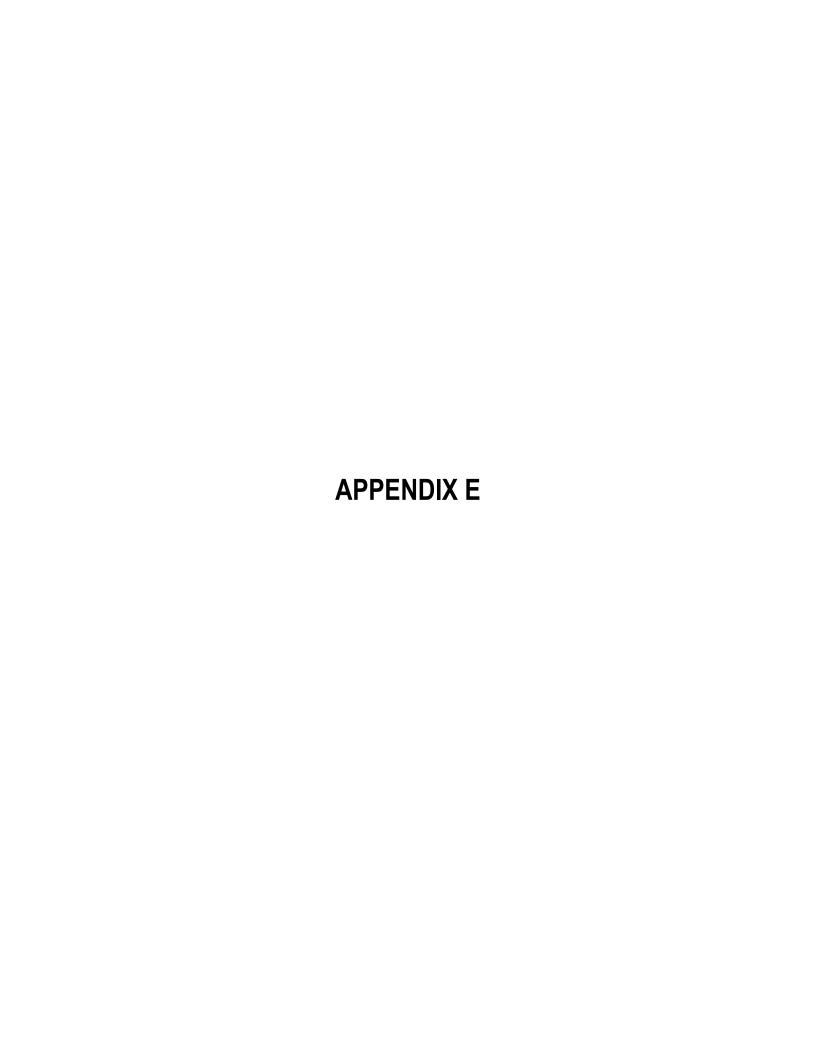
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2020-03-02T09:52:00-06:00	Nygard.com\Sabrina Agricola STA6914	Application for Certificate of Authority (FL).pdf	H:\Data\Globa\Nygard Services - Distribution\Nygard Services\tegal Dept\CORPORATE\Nygard Enterprises LLC\(1) Formation	File deleted	192.168.124.111
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2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Profile - Nova Scotia - FEB18-20.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada Ltd Directors & Officers Registers - JUL15-02.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada ltd Subscription of Shares - JUL15-02.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada Ltd Annual Return - AB 2019.pdf	H:\Data\Globa\(\)\ygard Services - Distribution\\\\)\ygard Services\(\)\Legal - Leases\(\)\Legal Dept\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00 2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914 Nygard.com\Sabrina Agricola STA6914	4093887 Canada Ltd Articles of Incorporation - JUL15-02.pdf 4093887 Canada Ltd Resolution re. Financials - FEB8-19 (DRAFT).docx	Ht/Qtara/Global/Wygard Services - Distribution/Wygard Services/Legal - Leases/Legal Dept/Financing/Bassett Financial Corporation/Due Diligence Checklist/1. Organization and Good Standing/Minute Book	File deleted File deleted	192.168.124.111 192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914 Nygard.com\Sabrina Agricola STA6914	4093887 Canada ltd Resolution re. Financiais - FEBS-19 (DRAFT). docx	H-\Data\Global\Wygard Service - Distribution\Wygard Service\Legal - Lease\Legal Dept\Financing\Basset Financial Corporation\Due Diligence Checkis\1.1 Organization and Good Standing\Minute Book He\Data\Global\Wygard Service - Distribution\Wygard Service\Legal - Lease\Legal Dept\Financing\Basset\Financial Corporation\Due Diligence Checkis\1.1 Organization and Good Standing\Minute Book He\Data\Global\Global\Pinancing\Basset\Financial Corporation\Due Diligence Checkis\1.1 Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada ltd Share Certificate - 2VC TTL 100 - JUL17-02.pdf	ht/Data/Global/Nygard Services - Distribution/Nygard Services/Legal - Lease\Legal Depty/Financing\Bassett Financial Corporation/Due Diligence Checklistyl. Organization and Good Standing Wilmite Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	Letter to Bennet Jones - encl Annual Return - 2019.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada Ltd By-Laws - JUL15-02.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	Notice of Change of Address of Director(s) - 4093887 Canada Ltddocx	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
2020-03-06T18:21:00-06:00	Nygard.com\Sabrina Agricola STA6914	4093887 Canada Ltd Annual Return - AB Filed APR2-19.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist\1. Organization and Good Standing\Minute Book	File deleted	192.168.124.111
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2020-03-06T21:11:00-06:00 2020-03-06T21:12:00-06:00	Nygard.com\Sabrina Agricola STA6914 Nygard.com\Sabrina Agricola STA6914	1e - (Part 1).zip 1e - (Part 1) (2).zip	H:\Data\Globa\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist H:\Data\Globa\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted File deleted	192.168.124.111 192.168.124.111
2020-03-06121:12:00-06:00 2020-03-06T21:19:00-06:00	Nygard.com\Sabrina Agricola STA6914 Nygard.com\Sabrina Agricola STA6914	1e - (Part 1) (2).2lp 1e - 879 & 887 Canada Ltd NB Extra Provincial Return - 2016 & 2017.pdf	n:\Uara(Jooda)\twygard service: -\Uartitution\twygard service\taga=\text{Lesse}\text{Legal}\text{-}\text{Lesse}\text{Lesse}\text{Legal}\text{-}\text{Lesse}\text{Lesse}\text{Legal}\text{-}\text{Lesse}\text{Lesse}\text{Lesse}\text{Legal}\text{-}Lesse	File deleted	192.168.124.111
2020-03-06T21:19:00-06:00	Nygard.com\Sabrina Agricola STA6914 Nygard.com\Sabrina Agricola STA6914	1e - 879 & 887 Canada Ltd NB Extra Provincial Return - 2016 & 2017 pur 1e - 879 & 887 Canada Ltd NB Extra Provincial Return - 2016 & 2017 signed.pdf	n_total_closuse_repair_orserve_construction_Negard_services_tegar_teases_tegar_teases_tegar_teases_termining_easset Financial curporation_to_construct_teases_tegar_teases_tegar_teases_termining_easset Financial Corporation_to_construct_teases_tease_teases_tease	File deleted	192.168.124.111
2020-03-07T09:55:00-06:00	Nygard.com\Sabrina Agricola STA6914	F1.1_EN.docx	H:\Data\Globa\\Nygard Services - Distribution\Nygard Services\Legal Dept\Financing\Bankruptcy Act Forms	File deleted	192.168.124.111
2020-03-07T10:23:00-06:00	Nygard.com\Sabrina Agricola STA6914	FLR-14B - Blair Seaton - SEP12-19.doc	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\SABRINA\CONFIDENTIAL	File deleted	192.168.124.111
2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	Due Diligence Checklist.zip	H:\Data\Globa\\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation	File deleted	192.168.124.111

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2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	1a - DOCS.zip	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	1e - (Part 1) (2).zip	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	1e - DOCS.zip	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	1e - (Part 3).zip	H:\Data\Giobal\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	4. Material Contracts & Details.zip	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
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2020-03-07T13:33:00-06:00	Nygard.com\Sabrina Agricola STA6914	1e - (Part 2).zip	H:\Data\Giobal\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\Bassett Financial Corporation\Due Diligence Checklist	File deleted	192.168.124.111
2020-03-09T12:36:00-05:00	Nygard.com\Sabrina Agricola STA6914	Microsoft Teams.lnk	G:\Data\GFF\sta\Desktop	File deleted	192.168.123.25
2020-03-11T12:06:00-05:00	Nygard.com\Sabrina Agricola STA6914	IMG_2570.HEIC	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\ID\(4) Tiina Tulikorpi	File deleted	192.168.124.111
2020-03-11T12:06:00-05:00	Nygard.com\Sabrina Agricola STA6914	IMG_2571.HEIC	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\ID\(4) Tiina Tulikorpi	File deleted	192.168.124.111
2020-03-11T12:06:00-05:00	Nygard.com\Sabrina Agricola STA6914	IMG_2569.HEIC	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\ID\(4) Tiina Tulikorpi	File deleted	192.168.124.111
2020-03-11T15:04:00-05:00	Nygard.com\Sabrina Agricola STA6914	e-Laws Ontario.url	G:\Data\GPF\sta\Favorites\Links	File deleted	192.168.124.111
2020-03-11T15:04:00-05:00	Nygard.com\Sabrina Agricola STA6914	Suggested Sites.url	G:\Data\GPF\sta\Favorites\Links	File deleted	192.168.124.111
2020-03-11T15:04:00-05:00	Nygard.com\Sabrina Agricola STA6914	Home Ontario Court Services.url	G:\Data\GPF\sta\Favorites\Links	File deleted	192.168.124.111
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2020-03-11T16:29:00-05:00	Nygard.com\Sabrina Agricola STA6914	(1) Nygard Biotech Corporation - Certificate of Incorporation (Delaware) - OCT5-11.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(4) Trust Structure - for DGM\(5) Nygard Biotec	File deleted	192.168.124.111
2020-03-11T16:29:00-05:00	Nygard.com\Sabrina Agricola STA6914	(1) Nygard Biotec Corporation - Certificate of Amendment (Delaware) - NOV17-11.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(4) Trust Structure - for DGM\(5) Nygard Biotec	File deleted	192.168.124.111
2020-03-11T17:55:00-05:00	Nygard.com\Sabrina Agricola STA6914	Nygard Holdings (USA) Limited-DE-Certificate of Incorporation - JUN3-19.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Corporate\Nygard Holdings (USA) Limited	File deleted	192.168.124.111
2020-03-12T13:33:00-05:00	Nygard.com\Sabrina Agricola STA6914	(5) Nygard Holdings (USA) Limited - Officers' Register - DEC27-19.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(4) Trust Structure - for DGM\(10) Nygard Holdings (USA) Limited	File deleted	192.168.124.111
2020-03-12T13:33:00-05:00	Nygard.com\Sabrina Agricola STA6914	(5) Nygard Holdings (USA) Limited - Shareholders' Register - DEC27-19.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(4) Trust Structure - for DGM\(10) Nygard Holdings (USA) Limited	File deleted	192.168.124.111
2020-03-18T08:00:00-05:00	Nygard.com\Sabrina Agricola STA6914	6. Nygrard Group Proposal Trustee First Report to Court.pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(1) White Oak\(1) RECEIVERSHIP MATTERS\(1) Documents	File deleted	125.110.99.152
2020-03-18T08:01:00-05:00	Nygard.com\Sabrina Agricola STA6914	10. Trustee Second Report to Court (with exhibits).pdf	H:\Data\Global\Nygard Services - Distribution\Nygard Services\Legal - Leases\Legal Dept\Financing\(1) White Oak\(1) RECEIVERSHIP MATTERS\(1) Documents	File deleted	125.110.99.152





KLDiscovery: Assessment of Options to Provide Access to Nygård Data

The diagram below summarizes the current state and options that are available and under consideration to facilitate access to Nygård data. The subsequent table describes each option, summarizes the workflow related to that option and provides an initial, high-level analysis of the noteworthy advantages, anticipated challenges and known cost implications. As illustrated and explained below, the available options can be viewed along a maturity scale considering the significant relative advantages and challenges of each solution.



Current State: Access to original servers, with minimal to no reliable search capability



Obtain copies of raw data collected by KLDiscovery from Nygård



Access KLDiscovery File Listing Database



Leverage KLDiscovery Nebula Big Data Store



Current State	Noteworthy Considerations	Known Cost Implications
Assessment More than a dozen original servers, with multiple storage points in the current environment, with limited to no reliable search capability	 Currently, Nygård data is distributed across more than a dozen, disparate systems. Each of those systems contain multiple terabytes of data that cannot feasibly or defensibly be searched. Any attempt to transfer the equipment will require the recipient to re-establish, operate and maintain the original server environment. The Nygård IT environment is uniquely configured. Fully replicating the same operating environment will be challenging. An alternative service provider will need to be established to conduct and support all aspects of this approach. KLDiscovery does not provide this service. On premises servers do not include data in the Nygård Microsoft Office 365 Tenant. Therefore, transfer of data or access to the Nygård Microsoft Office 365 Tenant will also be required. This approach does not enable the parties to conduct any meaningful, thorough or reliable searches. Any search result would, at best be partial and substantially incomplete. Further, attempts to search the data would require multiple attempts across different platforms using various software systems, with volatile results. Accessing data directly from original servers also does not enable parties to apply and verify date range cut off requirements pursuant to established confidentiality provisions. In summary, in its current state, attempting to search for data on the original servers as stored in multiple repositories present very significant hurdles with respect to timing and accuracy that ultimately eliminate the feasibly of this option and further demonstrate why a service provider with discovery expertise and technology has been engaged. 	 Ultimately, costs incurred could very likely meet or exceed estimated costs for NBDS, especially in light of potentially broad requests for data. Significant, future costs to extract, process, index search, review and produce data to meet discovery requirements should be anticipated. Undetermined costs include facilities and personnel to transfer, setup, maintain and support given systems.



Options to Obtain	Overview of Workflow	Noteworthy Advantages	Anticipated Challenges	Known Cost Implications
Nygård Data				
1. Leverage KLDiscovery Nebula Big Data Store (NBDS)	 All data Nygård provided to KLDiscovery will be hosted in NBDS. All Nygård data in NBDS will be fully searchable. Any interested parties can be directed to KLDiscovery to request searches of Nygård data in NBDS. Upon completion of a Statement of Work, interested parties will provide KLDiscovery with search parameters (date parameters, file types, term filters). Running the searches will be conducted at hourly rates. KLDiscovery will then conduct the requested searches, report on the quantity of data included in the results and provide a cost estimate for access to the results. Requestors can accept the given estimate or work with KLDiscovery to revise and adjust the search parameters to reduce the overall volume of data as needed. This may be an iterative process and will allow the parties to focus on the data that is of highest potential value or interest. Upon ultimate approval of the results and acceptance of the SOW, KLDiscovery will provide designated users with access to the results in the Nebula platform. 	 All Nygård data hosted in NBDS will be fully and easily searchable using key terms, date parameters and file type extensions. Once the NBDS repository of Nygård data is established, requestors can typically obtain search results on all or any subset of data within 1 to 3 days. Therefore, requestors can obtain results of detailed searches very quickly. In addition, by virtue of being able to effectively search the data, requestors will be able to minimize the amount of data they pay to process and host related to any given request. NBDS's search capability also enables the parties to apply and verify date range cut off requirements pursuant to established confidentiality provisions. Each requestor will have full access to the search results and all Nebula functionality to conduct further data analysis and document review, including tagging the data for privilege and other criteria (such as confidentiality designations, document importance, etc.) The Nebula platform will also allow the requestor to redact the data directly on the platform and to produce data from the platform if that is needed. By comparison to this option, extracting subsets of data from cold hardware storage will increase time and costs. Anticipating many, iterative requests from multiple interested parties over the course of several months (and possibly years), the costs for all parties will ultimately be less under this model. The proposed solution also ensures equitable cost allocation. The proposed solution takes Richter out of the role of intermediary between the requestors and KLD and enables an efficient, replicable solution for any requests that may come up. 	 This solution is designed to optimize the search, retrieval and discovery process. Therefore, this solution significantly minimizes operational challenges. Given the volume of data here (344 TB), setting up the entire NBDS repository will take approximately 3 months of setup time; however, data will be available for searching on a rolling basis as it is loaded. Additionally, the actual processing and loading of Nygård data to the NBDS platform can be prioritized, such that data that is of highest likely value or most likely to be needed, is loaded first. 	 Approximately \$441,973.16 for 172 TB of data for 24 months; or Approximately \$587,031.08 for 172 TB of data for 36 months; or Approximately \$708,736.56 for 344 TB of data for 24 months; or Approximately \$922,938.48 for 344 TB of data for 36 months. The costs of searching the repository for data sought by a specific Requestor or promoting that data to the Nebula review platform are not included in the given estimates and will vary according to the volume of data selected. Those costs may be allocated directly to the Requestor.



-	Overview of Workflow	Noteworthy Advantages	Anticipated Challenges	Known Cost Implications
Nygård Data		 The costs of running the searches, any iterative updates the searches, and the cost of processing and promoting the data will be borne directly by the requesting party, or, may be split with Nygård or other parties, as may be required. The specifics of cost allocation may be flexible and vary depending on who is requesting the data (i.e., the SDNY vs a former Nygård employee). This is a solid, long-term solution and will allow the expedited handling of any requests that arise for at least 2-3 years (or longer). Via robust searching capabilities and a streamlined process, each requestor will be able to locate the specific data it is seeking quickly and efficiently. 		



Options to Obtain	Overview of Workflow	Noteworthy Advantages	Anticipated Challenges	Known Cost Implications
Nygård Data	Overview of workhow	Hoterottily Advantages	Anticipated chancinges	initial cost implications
2. Access KLDiscovery File Listing Database	 High-level details about all data Nygård provided to KLDiscovery will be hosted in a Relativity database. The database only contains a detailed file listing, including only file name and file path. Full text searchable native files are not included in this database. Any interested parties can be directed to KLDiscovery to request searches of the Nygård File Listing Database. Upon completion of a Statement of Work, interested parties will provide KLDiscovery with search parameters (limited to file types and terms). Running the searches will be conducted at hourly rates. KLDiscovery will then conduct the requested searches, report on the quantity of data included in the results and provide a cost estimate for access to the results. Requestors can accept the given estimate or work with KLDiscovery to revise and adjust the search parameters to reduce the overall volume of data as needed. This may be an iterative process and will allow the parties to focus on the data that is of highest potential value or interest. Upon ultimate approval of the results and acceptance of the SOW, KLDiscovery will conduct the work necessary to access, extract and process the selected data from storage media in order to provide designated users with access to the results in the Nebula platform. 	 The File Listing Database will be complete within the month of October. Simple searches for folder names or file paths are easily achievable. 	 Searches are inherently limited to and by the simple folder names and file names available. Because there has been no data processing, native files and extracted text files are not available for searching. No container files or email databases/email user accounts have been extracted. Therefore, this solution does not allow for any email searching. The file listing does not include details such as senders, recipients, subjects and dates of emails or names of attachments. Upon finalization, the File Listing Database will contain over 40 million records, representing individual files in a myriad of folders. Any additional search parameters will need to be run after subsets of data are selected. Meanwhile, those results will inherently be limited to the initial selections. This solution will enable the parties to apply and verify date range cut off requirements pursuant to established confidentiality provisions, but only as an additional step after initial selection. Significant time and effort will be required to access, extract and process data from storage media. The process of locating the specific data each Requestor needs will be more time-consuming and cumbersome. 	 The file listing database hosting fees are currently approximately \$6k per month (e.g. \$144k for 24 months or \$216k for 36 months). Significant additional professional services, data processing and hosting will be required for each request. Ultimately, costs incurred could very likely meet or exceed estimated costs for NBDS, especially in light of potentially broad requests for data. Depending on the variety or disparity in selections, prolonged time frames for retrieval may be anticipated, thereby impacting a variety of direct and indirect costs.



Options to Obtain	Overview of Workflow	Noteworthy Advantages	Anticipated Challenges	Known Cost Implications
Nygård Data				
3. Obtain copies of raw data collected by KLDiscovery from Nygård	 There are two basic approaches to this workflow. The first option is that KLDiscovery provides copies of the forensic images (e.g. compressed data as it exists at the time of collection, requiring subsequent extraction). Alternatively, KLDiscovery can provide a complete forensic blowback (e.g. full native restores). Data will be provided to the requestors on a series of approximately 40 external hard drives. 	 A full copy of all data or selected servers (as detailed in the accompanying inventory) can be provided. Multiple, concurrent copies can be created. 	 Each full set of copies will take approximately 2 to 3 months to create, although multiple, concurrent copies may lend some efficiencies. Significant additional time, cost and effort will be required to find or filter potentially relevant information. This approach does not enable the parties to apply and verify date range cut off requirements pursuant to established confidentiality provisions. 	 Copies of Raw Images: approximately \$64,050 Copies of Restored Images: approximately \$70,550 Additional copies will cost approximately the same amount per request. Significant additional professional services, data processing and hosting will be required for any further work to make the data searchable. As delivered, the data will not be searchable. Ultimately, costs incurred could very likely meet or exceed estimated costs for NBDS, especially in light of potentially broad requests for data.

- To recap prior findings and directions KLDiscovery has received from Richter, other than the systems listed in the accompanying inventory that are being addressed and the Office 365 collections underway, the systems or sources of data that KLDiscovery is aware of and has not been directed to collect include the listed below. Therefore, the items listed below are not contemplated in the above options.
 - Nygård database servers
 - o Nygård ecommerce servers
 - o System, IT Admin or disaster recovery servers
 - Laptops & Desktops
 - Mobile devices
 - External hard drives
 - o Backup tapes



Prepared By:

Thomas Barce

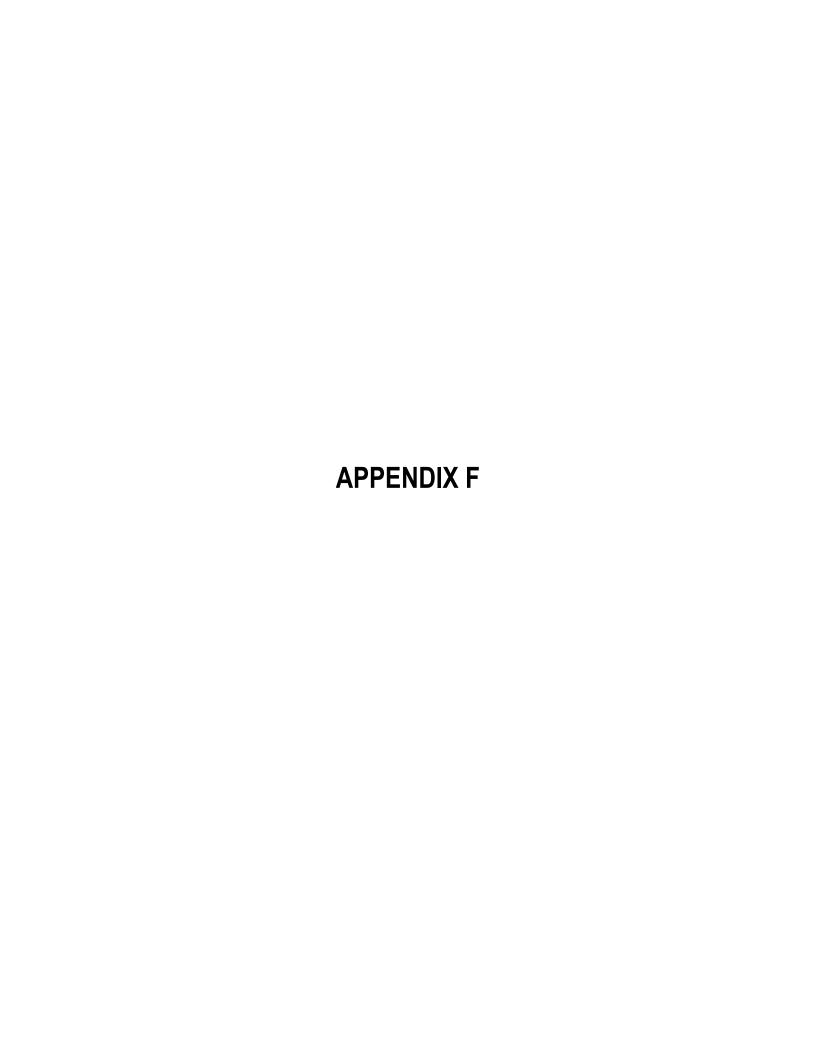
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From: Bruce Taylor

Sent: Sunday, October 11, 2020 3:31 PM

To: Wayne M. Onchulenko < <u>WOnchulenko@ltglc.ca</u>>; Domenico Magisano < <u>dmagisano@lerners.ca</u>> **Cc:** Greg Gutzler < ggutzler@dicellolevitt.com>; JJ Burnell < JBurnell@mltaikins.com>; Dacks, Jeremy

<<u>JDacks@osler.com</u>>; Rosenblat, Dave <<u>drosenblat@osler.com</u>>; Catherine Howden <<u>howden@pitblado.com</u>>; Ross

McFadyen <RAM@tdslaw.com>; Melanie LaBossiere <MML@tdslaw.com>

Subject: Nygard Receivership - Data Preservation and Access matters [LAW-TDS.FID1853952]

As we have indicated previously to you and the Court, the Receiver is investigating options for the preservation of data stored on the Nygard file servers in the event that the existing data/systems cannot be preserved. For your information and consideration, please see the attached "Assessment of Options to Provide Access to Nygard Data" prepared for the Receiver by KLD Discovery. KLD is aware that the Receiver will be circulating this Assessment, and disclosing it to the Court, in the context of the ongoing "Nygard" receivership proceedings.

We have indicated to you and the Court that the Receiver will be having a "pristine copy" of the Nygard data prepared and maintained by KLD. The process described in the attached Assessment as "Obtain copies of raw data collected by KLDiscovery from Nygard" would be similar to obtaining a raw copy of the data contained on the pristine copy. The process of making such a copy has been underway for some time.

As a further option for the preservation of and access to the entire Nygard network, including the data stored on the Nygard file servers, the Receiver is also investigating options/costs to migrate the data/systems to an offsite third party host. This may enable remote access to the data and existing systems to be maintained notwithstanding the dismantling of the Nygard servers/related equipment, for costs which will include the cost of migrating the data/systems, and thereafter ongoing monthly hosting costs. This option may present the opportunity to preserve the existing systems, albeit that in the circumstances, there may be only marginal benefit in preserving the ability to use the existing systems, as opposed to simply preserving the data. This option would also continue the inherent search/accessibility limitations of the existing systems, described in the KLD Assessment.

The Receiver has not yet made a determination as to which, if any, of the options described in the KLD Assessment would be recommended by the Receiver to the Court, in the event that it becomes necessary that the Nygard servers/related equipment be dismantled.

We are providing these to you so that you may review them and provide such input as you consider appropriate.

Regards,

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