
**Third Report to Court of
Duff & Phelps Canada Restructuring
Inc. as Trustee of the Bankrupt Estate
of Ornge Global GP Inc.**

June 27, 2012

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Court File No.: 32-158452

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE BANKRUPTCY OF ORNGE GLOBAL
GP INC., A CORPORATION INCORPORATED UNDER THE LAWS
OF ONTARIO, CARRYING ON BUSINESS IN THE CITY OF
MISSISSAUGA, IN THE PROVINCE OF ONTARIO

REPORT OF DUFF & PHELPS CANADA RESTRUCTURING INC.
AS TRUSTEE IN BANKRUPTCY

JUNE 27, 2012

1.0 Introduction

On February 2, 2011, the Ontario Superior Court of Justice (In Bankruptcy and Insolvency) (“Court”) made an order (the “Bankruptcy Order”) pursuant to the *Bankruptcy and Insolvency Act, R.S.C. 1985, c. B.-3*, as amended (the “BIA”), adjudging Ornge Global GP Inc. (“GP”) bankrupt. A related company, Ornge Global Holdings LP (“LP”), was adjudged bankrupt at the same time. A further related company, Ornge Global Solutions Inc., filed an assignment pursuant to the BIA on March 23, 2012.

Pursuant to the Bankruptcy Order, Duff & Phelps Canada Restructuring Inc. (“D&P”) was appointed trustee of GP’s bankrupt estate. The Trustee’s appointment was affirmed on February 23, 2012 at the first meeting of creditors.

This report (“Report”) is being filed by D&P in its capacity as Trustee.

1.1 Purpose of this Report

The purpose of this Report is to update the Court on the status of the Trustee’s application for judgment, among other relief, against Christopher Mazza, the Company’s former President and Chief Executive Officer (the “Application”).

2.0 Background

GP is part of a group of for-profit and not-for-profit entities collectively known as “Ornge” that provide air transport medical services to patients requiring critical, acute or emergency medical care in Ontario.

3.0 Application

Background information concerning the Application is set out in the affidavit of Robert Kofman, a representative of the Trustee, sworn March 20, 2012 (the “Affidavit”). The Affidavit is included in the Trustee’s application record in respect of the Application. In brief, the Trustee is seeking to recover \$700,000 plus interest loaned or advanced by GP to Dr. Mazza prior to GP’s bankruptcy.

On March 28, 2012, the Trustee entered into an escrow agreement with Dr. Mazza, his Powers of Attorney and his legal counsel, as escrow agent. The escrow agreement, as amended on March 30, 2012, sets out the terms pursuant to which \$650,000 has been set aside in a trust account from the sale of Dr. Mazza’s personal residence. The sale of Mr. Mazza’s residence closed on March 30, 2012.

On March 29, 2012, counsel representing the Trustee and Dr. Mazza appeared before Justice Morawetz regarding a consensual adjournment of the Application. Justice Morawetz adjourned the Application *sine die*, on terms, as set out in his endorsement dated March 29, 2012 (“Endorsement”). A copy of the Endorsement is provided as Appendix “A”. Among other things, Justice Morawetz directed the Trustee to report to the Court on the status of the Application no later than June 30, 2012.

3.1 Status

On June 5, 2012, the Trustee’s counsel contacted Dr. Mazza’s counsel in order to set a date for the return of the Application. Dr. Mazza’s counsel advised that due to medical reasons, Dr. Mazza would not be available to respond to the Application and participate in the proceedings until the latter part of the summer. The response is provided in Appendix “B”.

On the agreement of the Trustee and Dr. Mazza’s counsel, the Court has set September 12, 2012 to hear the Application.

* * *

All of which is respectfully submitted,

Duff + Phelps Canada Restructuring Inc.

**DUFF & PHELPS CANADA RESTRUCTURING INC.
IN ITS CAPACITY AS TRUSTEE OF THE BANKRUPT ESTATE OF
ORNGE GLOBAL GP INC. AND NOT IN ITS PERSONAL CAPACITY**

Appendix "A"

Duff & Phelps Canada Restructuring Inc., in its capacity as trustee in bankruptcy of Ornge Global GP Inc.
Applicant

Christopher Mazza
Respondent

Commercial List Court File No: CV-12-9648-00CL

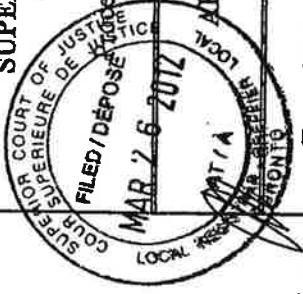
Mar 29 / 12

*A. Gray
A. Slavens for Applicant -
P.A. Vita, A.C. for Respondent.*

March 29, 2012.

*The parties have agreed to confront of
opponent since die. so he needed help for
living in 7 days' notice, in the following terms:
① Months for the sale of Dr. Tagy's home at
10 Blandford Cres. Tor. will be put in escrow
pending to: (a) the terms of escrow agreement
which is by the parties and (b) and solely
of Dr. Tagy's ad acting under the P/A -
request of Dr. Tagy.
② The trustee will not seek to bring back
the application until it has been advised
that Dr. Tagy is ~~well enough~~ well enough
to participate in the ~~old~~ ^{new} ~~minutes~~ ^{minutes},
provided that trustee shall be
enrolled & bring back the*

ONTARIO
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Proceeding commenced at Toronto

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Lawyers for Duff & Phelps Canada Restructuring Inc., in its capacity as trustee in bankruptcy of Ornge Global GP Inc.

application at any time following the expiry of
90 days from today.

Notwithstanding the foregoing, I will provide
states report to court ~~as~~ no later than.

Jun 30, 2012.

APR 2012

Appendix “B”

YLR

YACHETTI, LANZA & RESTIVO LLP

BARRISTERS & SOLICITORS

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June 21, 2012

VIA FACSIMILE: 1-416-865-7380

Scott Bomhof
Torys LLP
79 Wellington St. W., Suite 3000
Box 270, TD Centre
Toronto, ON M5K 1N2

Dear Mr. Bomhof:

RE: Dr. Christopher Mazza

I am writing to you further to our recent correspondence with respect to the hearing of the Application brought by the Trustee in Bankruptcy for Ornge Global GP Inc., that was adjourned sine die to be brought on seven (7) days notice.

I wish to confirm my advice to you that due to various medical problems that my client, Dr. Christopher Mazza, presently suffers from, he will not be able to actively participate in the proceedings, namely by making an Affidavit and possibly being subjected to cross-examination thereon, until the latter part of the summer. Consequently, it was agreed that the hearing of the Application will not take place until mid-September.

Yours very truly,
YACHETTI, LANZA & RESTIVO LLP
Per:


PETER A. VITA, Q.C.
PAV/er