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Our File No.: 232029

Confidential and Without Prejudice

City of Toronto
Legal Services
26th Floor, 55 John Street
Metro Hall
Toronto, ON M5V 3C6

Attention: Ray Kallio

Dear Sirs/Mesdames:

**Re: OLT-24-001144 – 202 Sheppard Avenue West
Without Prejudice Settlement Offer**

We are solicitors for Nikali Holding Corp. in respect of the property known municipally in the City of Toronto as 202 Sheppard Avenue West (the “**Lands**”). We write on behalf of our client to provide a without prejudice settlement offer in respect of the above-noted matter, which should be considered as open until the conclusion of the City Council meeting scheduled to commence on October 8, 2025, unless otherwise indicated.

Since the filing of the appeal, our client has engaged in without prejudice discussions with City staff. This process has been productive and has resulted in a revised set of plans, prepared by RAW Design Inc. dated September 4, 2025 (the “**Revised Plans**”). A copy of the Revised Plans is attached to this letter as Schedule “A”.

Our client greatly appreciates the efforts of City staff in achieving this proposed settlement. The terms of this without prejudice settlement offer are as follows:

1. The settlement offer is based on the Revised Plans, which would be implemented through the resulting official plan amendment and zoning by-law amendment. The primary modification reflected in the Revised Plans is a simplification of the approach to rear transition to more closely correspond with the 2024 Mid-Rise Design Guidelines. This minor modification allows for seven additional units, while enhancing the energy performance of the building. In addition, the Revised Plans provide for a modified unit mix. Whereas the scheme previously considered by Council included exclusively 1-bedroom units, the Revised Plans for two 3-bedroom units, ten 2-bedroom units, and twelve 1-bedroom units, meaning 50% of the units are capable of accommodating families.

2. Our client agrees that, in the event City Council accepts this without prejudice settlement offer, the final order of the Ontario Land Tribunal would be withheld until the proposed official plan amendment and zoning by-law amendments are in a final form satisfactory to the City Solicitor and Chief Planner and Executive Director, City Planning.

As noted above, this without prejudice settlement offer will remain open until the end of the City Council meeting scheduled to commence on October 8, 2025, unless otherwise indicated, at which point it should be considered as withdrawn if not accepted by City Council.

Yours truly,

Goodmans LLP



Max Laskin
MXL/

Schedule A
Revised Plans

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