

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON  
INVESTMENTS MASTER FUND LP AND MOEZ KASSAM**

Plaintiffs

- and -

**ROBERT LEE DOXTATOR, JACOB DOXTATOR AND JOHN DOE 1, JOHN  
DOE 2, JOHN DOE 3, JOHN DOE 4 AND OTHER PERSONS UNKNOWN**

Defendants

-and-

B E T W E E N:

**ROBERT LEE DOXTATOR**

Plaintiff by Counterclaim

- and -

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP, ANSON  
INVESTMENTS MASTER FUND LP, MOEZ KASSAM AND  
ALLEN SPEKTOR**

Defendants by Counterclaim

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**REPLY OF ROBERT LEE DOXTATOR TO THE AMENDED REPLY AND  
DEFENCE OF ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,  
ANSON INVESTMENTS MASTER FUND LP and MOEZ KASSAM**

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1. The Defendant/Plaintiff by Counterclaim Robert Lee Doxtator (“**Robert**”) repeats and relies on the facts pleaded in his Amended Statement of Defence and

Counterclaim.

2. Robert denies the allegations contained in the Amended Reply and Defence of Anson Advisors Inc., Anson Funds Management LP, Anson Investments Master Fund LP and Moez Kassam (the “**Anson Defendants**”), except as expressly admitted herein or in his Amended Statement of Defence and Counterclaim. Robert addresses certain claims specifically below.
3. Robert denies the Anson Defendants’ claim at paragraph 6 of their Amended Reply and Defence that Allen Spektor was not an employee of Anson. Robert pleads that he was an employee, which is consistent with Allen Spektor’s LinkedIn page that states he formally worked for Anson as an investment analyst from 2006 to 2008.
4. Robert denies the Anson Defendants’ characterization of the business relationship Robert had with the Anson Defendants. Robert provided due diligence on multiple trades, including GE, CannTrust and HEXO. Robert ended the relationship because he was not receiving monies owed to him pursuant to their agreement. The Anson Defendants were not transparent with Robert about all of the trades they were making or the number of shares on which they had a short position. They refused to provide profit & loss statements.
5. In reply to paragraphs 9, 10 and 11, Robert pleads that whenever the Anson Defendants traded following the receipt of his work, they were required to make proper payment to him. They did not do so. Robert further pleads that the Anson Defendants have not disclosed all of the trading that they carried out.
6. Robert denies that the Anson Defendants only owe him \$18,000. The amount is considerably higher and is based on, in part, the numerous trades that the Anson Defendants have thus far refused to disclose.

April 28, 2021

**GROIA & COMPANY**  
Professional Corporation ■ Lawyers  
Wildeboer Dellelce Place  
365 Bay St, 11<sup>th</sup> Floor  
Toronto, ON M5H 2V1

Tel: (416) 203-4472

Fax: (416) 203-9231

**Joseph Groia** LSO No. 20612J

[jgroia@groiacom.com](mailto:jgroia@groiacom.com)

*Lawyer for the Defendant/Plaintiff by  
Counterclaim, Robert Lee Doxtator*

**TO: BLAKE, CASSELS & GRAYDON LLP**

Barristers & Solicitors  
199 Bay Street, Suite 4000  
Commerce Court West  
Toronto, ON M5L 1A9

Tel: (416) 863-2400

Fax: (416) 863-2653

**Iris Fischer** LSO #52762M

Tel: 416-863-2408

[iris.fischer@blakes.com](mailto:iris.fischer@blakes.com)

**Michael Barrack** LSO #21941W

Tel: 416-863-5280

[michael.barrack@blakes.com](mailto:michael.barrack@blakes.com)

**Kaley Pulfer** LSO #58413T

Tel: 416-863-2756

[kaley.pulfer@blakes.com](mailto:kaley.pulfer@blakes.com)

**Christopher DiMatteo** LSO #68711E

Tel: 416-863-3342

[christopher.dimatteo@blakes.com](mailto:christopher.dimatteo@blakes.com)

*Lawyers for the Plaintiffs/Defendants  
by Counterclaim, Anson Advisors Inc.,  
Anson Funds Management LP, Anson Investments  
Master Fund LP and Moez Kassam*

**AND TO:**

**Allen Spektor**

45 Saulter Street,

Toronto, ON M4M 2H8  
[allenspektor@gmail.com](mailto:allenspektor@gmail.com)

**ANSON ADVISORS INC., ANSON FUNDS MANAGEMENT LP,  
ANSON INVESTMENTS MASTER FUND LP, MOEZ KASSAM  
AND ALLEN SPEKTOR**

**ROBERT LEE DOXTATOR**

Plaintiffs/Defendants by Counterclaim

and

Defendant/Plaintiff by Counterclaim

**ONTARIO  
SUPERIOR COURT OF JUSTICE  
Proceeding commenced in Toronto**

**REPLY OF ROBERT LEE DOXTATOR TO THE  
AMENDED REPLY AND DEFENCE OF ANSON  
ADVISORS INC., ANSON FUNDS MANAGEMENT LP,  
ANSON INVESTMENTS MASTER FUND LP AND  
MOEZ KASSAM**

**GROIA & COMPANY**  
Professional Corporation ■ Lawyers  
Wildeboer Dellelce Place  
365 Bay Street, 11th Floor  
Toronto, Ontario M5H 2V1  
Tel: (416) 203-4472  
Fax: (416) 203-9231

**Joseph Groia, LSO No. 20612J**  
[jgroia@groiacom.com](mailto:jgroia@groiacom.com)

*Lawyer for the Defendant/Plaintiff by Counterclaim,  
Robert Lee Doxtator*