



Order under Section 21.2 of the Statutory Powers Procedure Act and the Residential Tenancies Act, 2006

Citation: Bhullar v Navarro, 2026 ONLTB 30346

Date: 2026-04-15

File Number: LTB-L-071435-25-RV

In the matter of: 101, 5170 WINSTON CHURCHILL BLVD
MISSISSAUGA ON L5M0P2

Between: Anant Bir Singh Bhullar Landlord

And

Jake Navarro Tenant

Review Order

Anant Bir Singh Bhullar (the 'Landlord') applied for an order to terminate the tenancy and evict Jake Navarro (the 'Tenant') because the Tenant did not pay the rent that the Tenant owes.

This application was resolved by order LTB-L-071435-25 issued on January 7, 2026. Only the Landlord's representative attended the original hearing on November 13, 2025.

On February 6, 2026, the Tenant requested a review of the order and that the order be stayed until the request to review the order is resolved.

On February 9, 2026, interim order LTB-L-071435-25-RV-IN was issued, staying the order issued on January 7, 2026.

This review was heard by videoconference on March 12, 2026.

The Landlord, the Landlord's representative, Harpreet Luthra, and the Tenant attended the hearing.

Determinations:

The Review

1. For the following reasons, I am satisfied that order LTB-L-071435-25 issued on January 7, 2026 contains a serious error.
2. The tenancy was terminated based on an invalid N4 notice of termination. Section 43(c) of the *Residential Tenancies Act*, 2006 (the 'Act') states that the notice shall be in a form approved by the Board and shall be signed by the person giving the notice, or the person's agent. The N4 notice in the Board's file is not signed. Therefore, it is invalid. As such, I find that order LTB-L-071435-25 issued on January 7, 2026 contains a serious error.

3. The Landlord's representative argued that section 212(2) provides me discretion to find that the notice substantially complies with the Act even though it is not signed. I disagree. Section 43(c) specifically requires that termination notice shall be signed. In this case, it was not.
4. The Landlord's representative argued that the N4 notice served on the Tenant was signed, that the Landlord inadvertently uploaded an unsigned copy of the N4 notice and suggested that he could upload a signed copy to the Board's file.
5. Given that the Tenant could not locate the N4 notice he received to confirm that it was signed and the fact even if the Landlord uploaded a signed N4 notice, I would not be able to determine the date it was signed (i.e. the day it was served or the day of this hearing), I declined to allow the Landlord to upload a signed copy of the N4 notice.
6. I am satisfied that there is a serious error in the order. Therefore, the Tenant's request to review order LTB-L-071435-25 issued on January 7, 2026 is granted.

The *de novo* Application

7. At the outset, the Tenant produced a copy of the Notice to Creditors confirming that the Tenant filed a consumer proposal on October 30, 2025 [Doc 7553789]. The issue to be decided is whether the Landlord can convert to L1 application to an L9 application for arrears of rent only (i.e. no termination of tenancy).
8. Pursuant to section 69.2(1) of the *Bankruptcy and Insolvency Act*, RSC 1985, c B-3 (the 'BIA'), by filing a consumer proposal, any application claiming monetary compensation that arose on or before October 30, 2025 is stayed.
9. In *SIREG Management Inc. v. Goudreau*, 2026 ONLTB 4637, the Board found that it is only where the N4 notice delivered to a bankrupt tenant was based on only post-bankruptcy rent that the LTB may make an order under section 69 based on that N4. Where the N4 notice delivered to the tenant included pre-bankruptcy rent, the landlord must deliver a new N4 for the post-bankruptcy arrears and if the tenant does not vacate the unit or pay those arrears, file an L1 application based on that N4.
10. I am satisfied that the Landlord's L1 application cannot be converted to an L9 application for arrears of rent only because it is based on an N4 notice which includes pre-bankruptcy rent (i.e. May 1, 2025 to August 1, 2025). Therefore, the Landlord's application must be dismissed.

It is ordered that:

1. The request to review order LTB-L-071435-25 issued on January 7, 2026 is granted. The order is cancelled and cannot be enforced.
2. The Landlord's application is dismissed.

April 15, 2026
Date Issued

Karen Gonçalves
Member, Landlord and Tenant Board

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If you have any questions about this order, call 416-645-8080 or toll free at 1-888-332-3234.