

SUPREME COURT OF NOVA SCOTIA

IN THE MATTER OF the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C- 36, as amended (the "**CCAA**")

AND IN THE MATTER OF an application by Blue Lobster Capital Limited, 3284906 Nova Scotia Limited, 3343533 Nova Scotia Limited and 4318682 Nova Scotia Limited (collectively, the "**Applicants**") for relief under s. 11 of the CCAA and other relief.

NOTICE OF MOTION

To: The Service List as set out in Schedule "A" hereto

Motion¹

KSV Restructuring Inc., in its capacity as Court-appointed monitor of the Applicants (the "**Monitor**") in this proceeding, is applying to a judge for an Order (the "**Distribution and Ancillary Order**") pursuant to the CCAA:

- (a) approving the Beck Settlement and authorizing the Monitor to pay the Beck Settlement Amount, in full;
- (b) authorizing the Monitor to repay the Corkum Mortgage, in full, from the proceeds of the Coast Transaction;
- (c) extending the Stay until and including June 30, 2026; and
- (d) approving the Eighth Report of the Monitor dated March 12, 2026 and the Monitor's activities described therein.

Time and place

The motion is to be heard by a judge on March 23, 2026 at The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia (902-424-4900). The moving party has set the motion for a hearing at 9:30 a.m. (AT).

References

The moving party relies on the following legislation, Rules, or points of law:

¹ Capitalized terms used herein and not otherwise defined have the meanings ascribed to them in the Eighth Report of the Monitor dated March 12, 2026.

- (a) the provisions of the CCAA generally, including sections 11 and 36 thereof;
- (b) the *Nova Scotia Civil Procedure Rules*, and in particular Rules 2.03 and 23; and
- (c) such further and other references as counsel may advise and this Honourable Court may permit.

Evidence

The evidence in support of the motion is as follows:

- (a) the Eighth Report, to be filed; and
- (b) such further and other evidence as counsel may advise and this Honourable Court may permit.

Possible order against you

You may file an affidavit and a brief, attend the hearing of the motion, and state your position on whether the proposed order should be made. If you do not attend, the judge may grant an order without further notice to you.

Signed this 13th day of March, 2026



RECONSTRUCT LLP
80 Richmond Street West
Suite 1700
Toronto, ON M5H 2A4

Sharon Kour
skour@reconllp.com

Natasha Rambaran
nrambaran@reconllp.com

Counsel for KSV Restructuring Inc., in its
capacity as Court-appointed Monitor