

**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**

**Motion<sup>1</sup>**

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 "**Stay Extension Order**") pursuant to the CCAA extending the Stay until and including August 31, 2026.

**Time and place**

The motion is to be heard by a judge on June 25, 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 2:00 p.m. (AT).

**References**

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

- (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:

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<sup>1</sup> 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 Ninth 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 15<sup>th</sup> day of June, 2026



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capacity as Court-appointed Monitor

## SCHEDULE "A"

2024

Hfx No. 538745

### SUPREME COURT OF NOVA SCOTIA

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