

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

KSV Restructuring Inc., in its capacity as court-appointed monitor of the Applicants (the “**Monitor**”) in this proceeding is applying to a judge for two orders pursuant to the CCAA:

- (a) An order (the “**Claims Procedure Order**”), which, among other things, approves a procedure for the identification, quantification, and resolution of certain claims of creditors of the Applicants and their respective directors and officers; and
- (b) An order (the “**Ancillary Order**”), which, among other things:
 - (i) extends the stay period until and including January 31, 2026; and
 - (ii) approves the Fifth Report of the Monitor dated October 14, 2025 (the “**Fifth Report**”) and the Monitor’s activities described therein.

Time and Place

This motion is to be heard by a judge on October 22, 2025 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 3 p.m.

References

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

- (a) the provisions of the CCAA generally, including s. 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 Fifth Report of the Monitor, to be filed;
- (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 15th day of October, 2025



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capacity as Court-appointed Monitor