

SUPREME COURT OF NOVA SCOTIA

IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C., c. C-36,
AS AMENDED

AND IN THE MATTER OF A PLAN OR ARRANGEMENT OF 3306133 NOVA SCOTIA
LIMITED, 1003940 NOVA SCOTIA LIMITED, HEADLINE PROMOTIONAL PRODUCTS
LIMITED, BRACE CAPITAL LIMITED, BRACE HOLDINGS LIMITED AND 4648767
NOVA SCOTIA LIMITED

BETWEEN:

Fiera Private Debt Fund III LP and Fiera Private Debt Fund V LP,
each by their general partner, Fiera Private Debt GP Inc.

Applicants

-and-

3306133 Nova Scotia Limited, 1003940 Nova Scotia Limited, Headline Promotional Products
Limited, Brace Capital Limited, Brace Holdings Limited and 4648767 Nova Scotia Limited

Respondents

NOTICE OF MOTION
(returnable March 31, 2026)

To: The Service List attached hereto as **Schedule "A"**.

Motion

KSV Restructuring Inc. ("**KSV**"), in its capacity as Court-appointed Monitor (the "**Monitor**")
appointed under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended
(the "**CCAA**"), moves for the following orders:

1. if necessary, abridging and validating the time for service and filing of this notice of motion
and the Monitor's motion record;

2. an Approval and Vesting Order consisting of the following substantive relief:
- (a) approving the transaction (the “**Transaction**”) for the sale of the property municipally known as 255 George Street, Sydney, Nova Scotia (the “**Sydney Property**”) between 3306133 Nova Scotia Limited (“**3306**”) and Joe McDonald, or his nominee, pursuant to an agreement of purchase and sale dated February 11, 2026, and authorizing the Monitor, on behalf of 3306, to complete the Transaction; and
 - (b) vesting the Sydney Property in 4799325 Nova Scotia Limited, free and clear of claims and encumbrances, other than permitted encumbrances, upon execution and delivery of a certificate by the Monitor confirming completion of the Transaction;
3. a CCAA Termination Order consisting of the following substantive relief:
- (a) approving an extension of the Stay¹ to the earlier of: (a) the filing with this Court by the Monitor of the Monitor’s Certificate (the time of service thereof being the “**CCAA Termination Time**”); and (b) May 29, 2026;
 - (b) discharging and releasing KSV in its capacity as Monitor effective as of the CCAA Termination Time;
 - (c) discharging and releasing the Charges effective as of the CCAA Termination Time;
 - (d) approving the Eleventh Report and the Monitor’s activities described therein; and

¹ Capitalized terms used but not defined herein have the meanings given to them in the Eleventh Report of the Monitor dated March 18, 2026 (the “**Eleventh Report**”).

- (e) approving the fees and disbursements of the Monitor, Chaitons and Burchell, including the Fee Accrual, as described in Section 7 of the Eleventh Report; and

4. such further and other relief as this Honourable Court may deem just.

Time and Place

The motion is to be heard by Justice John Keith at 9:30 a.m. (ADT) on March 31, 2026, at the Supreme Court of Nova Scotia, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has arranged for a half day in chambers. The moving party acknowledges that the motion will not require more time.

References

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

1. *Companies' Creditors Arrangements Act*, ss. 11 and 11.02; and
2. The Nova Scotia *Civil Procedure Rules*, and in particular Rules 2.03 and 23.

Evidence

The evidence filed in support of the motion is as follows:

1. The Eleventh Report, to be filed; and
2. Such further and other evidence as the moving party 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.

Signature

Signed March 19, 2026



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SCHEDULE A

2024

Hfx No. 531463

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(MARCH 19, 2026)**

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