

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 July ●, 2025)

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

c/o **STEWART MCKELVEY**
600-1741 Lower Water St.
Halifax, NS B3J 0J2

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and the Service List attached hereto as **Schedule "A"**.

Motion

KSV Restructuring Inc., in its capacity as Court-appointed Monitor (the “**Monitor**”), moves for 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. approving a sale transaction in respect of the property located at 2 Second Street, Yarmouth, Nova Scotia (“**Second Street**”) pursuant to an agreement of purchase and sale between 3306133 Nova Scotia Limited, as vendor, and Atlantic Blue Marine Enterprises Inc. (the “**Purchaser**”) dated June 20, 2025 (the “**APS**”), and vesting title to Second Street in the Purchaser free and clear of claims and encumbrances other than the Permitted Encumbrances (as defined in the APS);
3. approving the Supplement to Eighth Report of the Monitor dated July 9, 2025 (the “**Supplemental Report**”) and the Monitor’s activities described therein;
4. sealing the confidential appendices to the Supplemental Report; and
5. 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 ● p.m. (ADT) on ●, July ●, 2025, at the Supreme Court of Nova Scotia, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has arranged for ● minutes 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 Supplemental 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 July 9, 2025



CHAITONS LLP

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George Benchetrit

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SCHEDULE A

2024

Hfx No. 531463

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Applicants

-and-

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Limited, Brace Capital Limited, Brace Holdings Limited and 4648767 Nova Scotia Limited

Respondents

**SERVICE LIST
(JULY 9, 2025)**

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OF SALTWIRE NETWORK INC., THE HALIFAX
HERALD LIMITED, HEADLINE PROMOTIONAL
PRODUCTS LIMITED, TITAN SECURITY &
INVESTIGATION INC., BRACE CAPITAL LIMITED AND
BRACE HOLDINGS LIMITED

NOTICE OF MOTION

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