

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



CHAITONS LLP

5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

George Benchetrit

Tel: (416) 218-1141

Email: george@chaitons.com

David Im

Tel: (416) 218-1124

Email: dim@chaitons.com

Lawyers for the Monitor

SCHEDULE A

2024

Hfx No. 531463

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

**SERVICE LIST
(MARCH 19, 2026)**

<p>NORTON ROSE FULBRIGHT CANADA LLP 222 Bay Street, Suite 3000, P.O. Box 53 Toronto, ON M5K 1E7</p> <p>Jennifer Stam Tel: 416.202.6707 jennifer.stam@nortonrosefulbright.com</p> <p>Lauren Archibald lauren.archibald@nortonrosefulbright.com</p> <p>Andrew Brewer andrea.brewer@nortonrosefulbright.com</p> <p>BOYNECLARKE LLP 99 Wyse Road, Suite 600 Dartmouth, Nova Scotia B3A 4S5</p> <p>Joshua J. Santimaw Tel: 902.460.3451 jsantimaw@boyneclarke.com</p> <p>Lawyers for the Applicants, Fiera Private Debt Fund III LP and Fiera Private Debt Fund V LP</p>	<p>KSV RESTRUCTURING INC. 220 Bay Street, Suite 1300 Toronto Ontario M5J 2W3</p> <p>Bobby Kofman Tel: 416.932.6228 Email: bkofman@ksvadvisory.com</p> <p>Mitch Vininsky Tel: 416.932.6013 Email: mvininsky@ksvadvisory.com</p> <p>Monitor</p>
<p>CHAITONS LLP 5000 Yonge Street 10th Floor Toronto, ON M2N 7E9</p> <p>George Benchetrit 416.218.1141 george@chaitons.com</p> <p>Lawyers for the Monitor</p>	<p>RESOLVE ADVISORY SERVICES LTD</p> <p>David Boyd davidboyd.resolve@gmail.com</p> <p>Chief Restructuring Officer</p>
<p>STEWART MCKELVEY 600-1741 Lower Water St. Halifax, NS</p> <p>Maurice Chiasson Tel: 902.420.3300 Email: mchiasson@stewartmckelvey.com</p> <p>Sara Scott Tel: 902.420.3363 Email: sscott@stewartmckelvey.com</p> <p>Lawyers for the Respondents</p>	<p>ATTORNEY GENERAL OF CANADA, DEPARTMENT OF JUSTICE Tax Law Services Atlantic Regional Office Suite 1400, Duke Tower 5251 Duke Street Halifax, NS N3J 1P3</p> <p>AGC_PGC_ARO-BRA@JUSTICE.GC.CA</p> <p>Deanna M. Frappier, K.C. Deanna.frappier@justice.gc.ca</p>

<p>CANADA REVENUE AGENCY Insolvency Division P.O. Box 638, Stn Central 145 Hobsons Lake Drive Halifax, NS B3J 2T5</p> <p>Devon.Steele@cra-arc.gc.ca</p>	<p>UNITED FOOD AND COMMERCIAL WORKERS OF CANADA, LOCAL 1252 (UFCW CANADA, LOCAL 1252) 120 Lemarchant Rd St. John's, NFLD A1C 2H2 Tel: 709.753.8830</p> <p>Sandra Corbett Email: scorbett@ufcw.nf.net</p>
<p>SHAWINIGAN-SUD NATIONAL VERIFICATION AND COLLECTION CENTRE Canada Revenue Agency 4695 Shawinigan-Sud Blvd. Shawinigan QC G9P 5H9</p>	<p>NOVA SCOTIA DEPARTMENT OF JUSTICE Legal Services Division 1690 Hollis St., 8th Floor Halifax, NS B3J 1T0</p> <p>Andrew Hill, Solicitor – Litigation Services Tel: 902.220.6623 Email: Andrew.Hill@novascotia.ca</p> <p>Lawyers for the Superintendent of Pensions</p>
<p>CWA CANADA</p> <p>Carmel Smyth, President Email: csmyth@cwacanada.ca</p> <p>Patrick Legay, Staff Representative Email: plegay@cwacanada.ca</p>	<p>COX & PALMER LLP Nova Centre – South Tower 1500-1625 Grafton Street Halifax, NS B3J 0E8</p> <p>Kevin Latimer, KC Tel: 902.491.4212 Email: klatimer@coxandpalmer.com</p> <p>John T.G. Boyle Tel: 902.491.4137 Email: jboyle@coxandpalmer.com</p> <p>Lawyers for Transcontinental Nova Scotia Media Group Inc.</p>
<p>UNIFOR UNION OF CANADA, LOCAL 441G 115 Gordon Baker Road Toronto, ON M2H 0A8</p> <p>Anthony F. Dale Tel: 1.800.268.5763 ext. 8475 Email: Anthony.Dale@unifor.org</p>	<p>MCMILLAN LLP Brookfield Place, 181 Bay Street, Suite 4400 Toronto, Ontario M5J 2T3</p> <p>Brett Harrison Tel: 416.301.5995 Email: Brett.harrison@mcmillan.ca</p> <p>Lawyers for the landlord of the Herald's head office at 2717 Joseph Howe Drive, Manulife Investment Management</p>

<p>MANULIFE 2727 Joseph Howe Drive, PO Box 1030 Halifax, NS B3J 2X5</p> <p>Karrie LeDrew Client Relationship Manager, Group Retirement Solutions</p> <p>Tel: 902.718.9674 Email: karrie_ledrew@manulife.ca</p> <p>Administrator of the defined benefit and defined contribution plan of Saltwire Networks Inc. and The Halifax Herald Limited</p>	<p>COX & PALMER LLP Nova Centre – South Tower 1500-1625 Grafton Street Halifax, NS B3J 0E8</p> <p>Richard W. Norman Tel: 902 491 4128 Email: rnorman@coxandpalmer.com</p> <p>Lawyers for CWA/ITU Pension Trustees</p>
<p>OSLER, HOSKIN & HARCOURT LLP 100 King Street West 1 First Canadian Place, Suite 6200 PO Box 50 Toronto, ON M5X 1B8</p> <p>Andrea Boctor Tel: 416.862.4945 Email: aboctor@osler.com</p> <p>Martino Calvaruso Tel: 416.862.6665 Email: mcalvaruso@osler.com</p> <p>Lawyers for Eckler AdminCorp Ltd.</p>	<p>GOODMANS LLP Bay Adelaide Centre 333 Bay Street, Suite 3400 Toronto, ON M5H 2S7</p> <p>Joseph Pasquariello Tel: 416.597.4216 Email: jpasquariello@goodmans.ca</p> <p>Mark Spiro Tel: 416.597.5140 Email: mspiro@goodmans.ca</p> <p>Lawyers for Postmedia Network Inc.</p>
<p>MAXIMUS CANADA SERVICES INC.</p> <p>Thang Trinh Email: Thang.trinh@maximuscanada.ca</p> <p>Charles Sweeney Email: charlesksweeney@maximus.com</p>	<p>Service Canada / Government of Canada</p> <p>Julie Matte Senior Program Advisor Wage Earner Protection Program (WEPP)</p> <p>Email: julie.l.matte@servicecanada.gc.ca Tel: 613-330-9405</p>
<p>COX & PALMER Nova Centre – South Tower 1500-1625 Grafton Street Halifax, NS B3J 0E8</p> <p>Gavin MacDonald Tel: (902) 491 4464 Email: gmacdonald@coxandpalmer.com</p> <p>Lawyers for TD Bank</p>	<p>ARTHUR J. GALLAGHER CANADA Email: limitedlois_grandy@ajg.com</p>

<p>STEWART MCKELVEY 600-1741 Lower Water St. Halifax, NS</p> <p>Ian Bilek Tel: 902.420.3399 Email: ibilek@stewartmckelvey.com</p> <p>David Wedlake Tel: 902.420.3363 Email: dwedlake@stewartmckelvey.com</p> <p>Lawyers for 3098637 Nova Scotia Limited</p>	<p>INKBLOT TECHNOLOGIES Email: Inc.Christina@Inkblottherapy.Com</p>
<p>kaitlin.stephens@justice.gc.ca; lindsay.lowden@justice.gc.ca</p>	<p>WESTLAND INSURANCE GROUP LTD – HALIFAX Email: Rrodgers@Westlandinsurance.Com</p>
<p>DEPUTY PTY LTD (USD) Email: Sales-Finance@Deputy.Com</p>	<p>U-HAUL Email: 843046_Gm@Uhaul.Com</p>
<p>STEELE HYUNDAI Email: Mwoodworth@Steelehyundai.Com</p>	
<p>BLUECROSS Email: bc_collection@medavie.bluecross.ca</p>	
<p>DEPARTMENT OF FINANCE AND TREASURY BOARD 7th Floor, Provincial Building 1723 Hollis Street P.O. Box 187 Halifax, NS B3J 2N3</p> <p>Allan MacMaster Email: financeminister@novascotia.ca</p>	

PPSA REGISTRANTS

<p>XEROX CANADA LTD. 2 Sheppard Ave E, Suite 1200 Toronto, ON M2N 5Y7</p> <p>Suite 500 Box 700 20 York Mills Road Toronto, ON M2P 2C2</p> <p>E-mail: customerinquiry@xerox.com</p>	<p>HYUNDAI CAPITAL LEASE INC. 123 Front Street, Suite 1000 Toronto ON M5J2M3</p>
<p>THE TORONTO DOMINION BANK – 54203 PO Box 427 1785 Barrington St., Halifax, NS B3J 2P8</p> <p>Michael Baini, Manager Tel: (902) 420-8040 Email: michael.baini@td.com</p>	<p>THE TORONTO DOMINION BANK – 54213 7071 Bayers Rd. Halifax, Nova Scotia B3L 2C2</p> <p>Haleigh Clarke, Manager Tel: 902-496-6767 Fax: 902-455-2811 Email: Haleigh.clarke@td.com</p>
<p>CISCO SYSTEMS CAPITAL CORPORATION 170 W. Tasman Drive MS SJ13-3 San Jose, CA 95134 USA</p> <p>Email: cs-rep@cisco.com</p>	<p>WELLS FARGO EQUIPMENT FINANCE COMPANY 1290 Central Parkway W. Suite 1100 Mississauga, ON L5C 4R3</p> <p>Email: wfeccustomer@wellsfargo.com</p>
<p>LBEL INC. 5035 South Service Rd Burlington, ON L7L 6M9</p> <p>Email: tcustomerservice@lbccapital.ca</p>	<p>KIA FINANCE 123 Front Street, Suite 1000 Toronto ON M5J 2M3</p>
<p>THE BANK OF NOVA SCOTIA 10 Wright Boulevard Stratford, ON N5A 7X9</p>	<p>DE LAGE LANDEN FINANCIAL SERVICES CANADA INC. 3450 Superior Court, Unit 1 Oakville, ON L6L 0C4</p>

Email Service List

jennifer.stam@nortonrosefulbright.com; jsantimaw@boyneclarke.com;
davidboyd.resolve@gmail.com; mchiasson@stewartmckelvey.com; sscott@stewartmckelvey.com;
Devon.Steele@cra-arc.gc.ca; AGC_PGC_ARO-BRA@JUSTICE.GC.CA;
Deanna.frappier@justice.gc.ca; bdosanjh@cavalluzzo.com; sfitzpatrick@cavalluzzo.com;
ssayegh@cavalluzzo.com; scorbett@ufcw.nf.net; Anthony.Dale@unifor.org;
Andrew.Hill@novascotia.ca; klatimer@coxandpalmer.com; jboyle@coxandpalmer.com;
karrie_ledrew@manulife.ca; aboctor@osler.com; mcalvaruso@osler.com;
brett.harrison@mcmillan.ca; Thang.trinh@maximuscanada.ca; charlesksweeney@maximus.com;
gmacdonald@coxandpalmer.com; michael.baini@td.com; cs-rep@cisco.com;
wfefccustomercare@wellsfargo.com; tccustomerservice@lbccapital.ca;
jpasquariello@goodmans.ca; mspiro@goodmans.ca; julie.l.matte@servicecanada.gc.ca;
amanda.dion@servicecanada.gc.ca; stephanie.grace@xerox.com; kaitlin.stephens@justice.gc.ca;
lindsay.lowden@justice.gc.ca; lois_grandy@ajg.com; sales-finance@deputy.com;
christina@inkblottherapy.com; mwoodworth@steelehyundai.com;
rrogers@westlandinsurance.com; bc_collection@medavie.bluecross.ca; 843046_gm@uhaul.com;
financeminister@novascotia.ca; ibilek@stewartmckelvey.com; dwedlake@stewartmckelvey.com

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

Applicant

-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

2024 Hfx No. 531463

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

NOTICE OF MOTION

CHAITONS LLP

5000 Yonge Street, 10th Floor
Toronto, Ontario M2N 7E9

George Benchetrit

Tel: 416-218-1141

Email: george@chaitons.com

David Im

Tel: (416) 218-1124

Email: dim@chaitons.com

Lawyers for the Monitor