

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 September 22, 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**
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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 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 (the “**AVO**”):
 - (a) approving the transaction (the “**Transaction**”) for the sale of the property municipally known as 311 Bluewater Road, Bedford between 1003940 Nova Scotia Limited (“**1003**”) and 3098637 Nova Scotia Limited (the “**Purchaser**”) pursuant to an agreement of purchase and sale dated August 20, 2025 (the “**APS**”), and authorizing the Monitor, on behalf of 1003, to complete the Transaction; and
 - (b) vesting the Property (as defined in the AVO) in the Purchaser or its nominee, free and clear of encumbrances other than the Permitted Encumbrances (as defined in the AVO) upon execution and delivery of a certificate by the Monitor confirming completion of the Transaction;
3. an Ancillary Order (the “**Ancillary Order**”):
 - (a) sealing the confidential appendices to the Ninth Report of the Monitor dated September 12, 2025 (the “**Ninth Report**”);

- (b) authorizing the Monitor to make distributions to: (a) the Applicants up to the balance owing to them by the Companies; and (b) Eckler Admin Corp. Ltd. (“**Eckler**”) for \$500,000, as described in the Ninth Report; and
 - (c) approving the Ninth Report and the Monitor’s activities described therein; 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 8:30 a.m. (ADT) on Monday, September 22, 2025, at the Supreme Court of Nova Scotia, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has arranged for 15 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 Ninth 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 September 12, 2025



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SCHEDULE “A”

2024

Hfx No. 531463

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**SERVICE LIST
(SEPTEMBER 12, 2025)**

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