

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

Saltwire Network Inc., The Halifax Herald Limited, Headline Promotional Products Limited,  
Titan Security & Investigation Inc., Brace Capital Limited and Brace Holdings Limited

Respondents

**NOTICE OF MOTION**  
**(returnable April 30, 2024)**

**To:** Saltwire Network Inc., The Halifax Herald Limited, Headline Promotional Products  
Limited, Titan Security & Investigation Inc., Brace Capital Limited and Brace  
Holdings Limited

c/o **STEWART MCKELVEY**  
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and the Service List attached hereto as **Schedule "A"**.

## **Motion**

Capitalized terms used herein and not otherwise defined have the meaning given to them in the Amended and Restated Initial Order made in this proceeding on March 22, 2024 (the “**Initial Order**”).

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 an extension of the Stay Period as recommended in the Second Report of the Monitor (the “**Second Report**”), to be filed;
3. Approving a sale process in respect of the assets of Titan Security & Investigation Inc. (“**Titan**”), as described in the Second Report, including the engagement of MC Advisory Group Inc. as sales agent to Titan, under the supervision of the Monitor and David Boyd, as Chief Restructuring Officer, on the terms described in the Second Report;
4. Approving an increase to the maximum principal amount Saltwire Network Inc. and The Halifax Herald Limited (the “**Borrowers**”) may borrow under the amended and restated debtor in possession term sheet dated as of March 22, 2024, between the Applicants, as lender, the Borrowers and the other Respondents, as guarantors (as the same will be further amended and restated and filed with the Second Report), as recommended in the Second Report;
5. If necessary, an order sealing confidential information to be filed by the Monitor in connection with this motion; and
6. Such further and other relief as this Honourable Court may deem just.

### **Time and Place**

The motion is to be heard by Justice Keith at 9:30 a.m. (AST) on Tuesday, April 30, 2024, in 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, 11.02, and 11.2; and
2. The Nova Scotia *Civil Procedures Rules*, and in particular Rules 2.03 and 23.

### **Evidence**

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

1. The Second Report, to be filed;
2. The Supplement to the Second Report, to be filed; and
3. 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**

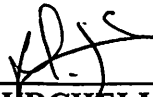
Signed April 16 2024



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**Lawyers for KSV Restructuring Inc., in its  
capacity as Court-Appointed Monitor**

**SCHEDULE A  
SERVICE LIST**

2024

Hfx No. 531463

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