

2024

Hfx No. 531915

**Supreme Court of Nova Scotia  
In Bankruptcy and Insolvency**

IN THE MATTER OF: THE RECEIVERSHIP OF TCAS HOLDINGS LIMITED, SUSTAINABLE FISH FARMING (CANADA) LIMITED, SUSTAINABLE BLUE INC. and TCAS IP INC.

**Notice of Motion by Correspondence**

To: The parties listed in Schedule "A" via electronic mail

**Motion**

Deloitte Restructuring Inc. in its capacity as court appointed receiver of the respondent companies (the "Receiver") moves for an order increasing the amount of authorized borrowing and Receiver's Borrowings Charge to \$2,500,000 in accordance with the Order of this Court issued April 4, 2024.

**Time and place**

The moving party proposes that this Motion will be determined by correspondence unless notice of contest is filed with the Court on or before May 10, 2024. In the event of a contest or further direction of the Court, this motion will be converted to a motion in person at a date and time to be set by the Court.

**References**

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

1. Bankruptcy and Insolvency Act section 243; and
2. Bankruptcy and Insolvency Act General Rules (Can. Reg. 368) section 6.

**Evidence**

The evidence in support of the motion is as follows:

1. First Report of the Receiver dated May 2, 2024.

**Possible order against you**

You may file an affidavit and a brief stating your position on whether the proposed order should be made. If you do not make a filing, the Judge may grant an order without further notice to you.

Form 23.03

**Signature**

Signed on May 3, 2024.

A handwritten signature in blue ink, appearing to be 'G. MacDonald', written over a horizontal line.

Gavin MacDonald as Counsel for Deloitte  
Restructuring Inc.  
Cox & Palmer  
Nova Centre – South Tower  
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Halifax, NS B3J 0E8  
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\*10042221/00003/4491317/v1

**Schedule "A"**

**Service List**

**SUPREME COURT OF NOVA SCOTIA  
IN BANKRUPTCY AND INSOLVENCY**

**In the Matter of the Receivership of TCAS Holdings Limited, Sustainable  
Fish Farming (Canada) Limited, Sustainable Blue Inc. and TCAS IP Inc.**

Between:

**4595756 Nova Scotia Limited**

**Applicant**

and

**TCAS Holdings Limited, Sustainable Fish Farming (Canada) Limited, Sustainable Blue  
Inc. and TCAS IP Inc.**

**Respondents**

**SERVICE LIST**

<p><b>4595756 Nova Scotia Limited</b> c/o Stewart McKelvey 600-1741 Lower Water Street Halifax, NS B3J 0J2</p> <p><b>Maurice P. Chiasson, K.C.</b> 902-420-3300 <a href="mailto:mchiasson@Stewartmckelvey.com">mchiasson@Stewartmckelvey.com</a></p> <p><b>David Wedlake</b> 902-444-1705 <a href="mailto:dwedlake@stewartmckelvey.com">dwedlake@stewartmckelvey.com</a></p> <p>Applicant</p>	<p><b>TCAS Holdings Limited TCAS IP Inc.</b> 20 MacDonald Ave. Dartmouth, NS B3B 1C5</p> <p><b>Chris Sangster</b> <a href="mailto:cds@stevensgroup.ca">cds@stevensgroup.ca</a></p> <p><b>Sustainable Fish Farming (Canada) Limited Sustainable Blue Inc.</b> 20 MacDonald Ave. Dartmouth, NS B3B 1C5</p> <p><b>Kirk Havercroft</b> <a href="mailto:kirkhavercroft@sffc.ca">kirkhavercroft@sffc.ca</a></p> <p>Respondents</p>
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<p><b>Deloitte Restructuring Inc.</b> 1741 Lower Water Street, Suite 800 Halifax, NS B3J 0J2</p> <p><b>James Foran, CPA, CA, CIRP, LIT</b> 902-721-5661 <a href="mailto:jforan@deloitte.ca">jforan@deloitte.ca</a></p> <p><b>Todd Ambachtsheer, CPA, CA, CIRP, LIT</b> 416-607-0781 <a href="mailto:tambachtsheer@deloitte.ca">tambachtsheer@deloitte.ca</a></p> <p><b>Naomi McGregor</b> 403-503-1423 <a href="mailto:naomcgregor@deloitte.ca">naomcgregor@deloitte.ca</a></p> <p><b>Colleen O'Brien</b> 709-758-5215 <a href="mailto:colobrien@deloitte.ca">colobrien@deloitte.ca</a></p> <p>Receiver and Manager</p>	<p><b>Cox &amp; Palmer</b> Nova Centre, South Tower 1500-1625 Grafton Street Halifax, NS B3J 3E5</p> <p><b>Josh McElman, K.C.</b> 506-633-2708 <a href="mailto:jmcelman@coxandpalmer.com">jmcelman@coxandpalmer.com</a></p> <p><b>Gavin MacDonald</b> 902-491-4464 <a href="mailto:gmacdonald@coxandpalmer.com">gmacdonald@coxandpalmer.com</a></p> <p>Counsel to Receiver and Manager</p>
<p><b>Bayt Al Qoot UK Ltd.</b> c/o Clyde &amp; Co 401 Bay Street, Suite 2500 Toronto, ON M5H 2Y4</p> <p><b>George Karayannides, Q.Arb</b> 647-789-4831 <a href="mailto:george.karayannides@clydeco.ca">george.karayannides@clydeco.ca</a></p> <p><b>Abhi Jalan</b> 971-4-384-4000 <a href="mailto:Abhi.Jalan@clydeco.ae">Abhi.Jalan@clydeco.ae</a></p>	<p><b>Atlantic Compressed Air Ltd.</b> 484 Edinburgh Drive Moncton, NB E1E 2L1</p> <p><b>Luc Theriault</b> 506-858-9500, ext. 104 <a href="mailto:luc.theriault@atlanticcompressedair.ca">luc.theriault@atlanticcompressedair.ca</a></p>
<p><b>Linde Canada Inc.</b> 80 Westcreek Blvd Brampton, ON L6T 0B8</p> <p><b>Brian Ramnarine</b> 833-796-3800, ext. 4517 <a href="mailto:brian.ramnarine@linde.com">brian.ramnarine@linde.com</a></p>	<p><b>Atlantic Fisheries Fund</b> PO Box 1006 1 Challenger Drive Dartmouth, NS B2Y 4A2</p> <p><b>Stacey Frame</b> 902-401-8255 <a href="mailto:stacey.frame@dfo-mpo.gc.ca">stacey.frame@dfo-mpo.gc.ca</a></p>

<p><b>Atlantic Canada Opportunities Agency</b> ACOA Legal Services 644 Main Street P.O. Box 6051 Moncton, NB E1C 9J8</p> <p><b>Karine Le Breton</b> 506-875-9355 <a href="mailto:karine.lebreton@justice.gc.ca">karine.lebreton@justice.gc.ca</a></p>	
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**Email Service List**

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