

June 18, 2021

**\*\*\* HAND-DELIVERED – URGENT - WE REQUIRE THESE DOCUMENTS  
TODAY FOR SERVICE PURPOSES \*\*\***

#67840-MD

Court Administration  
Supreme Court of Nova Scotia  
The Law Courts  
1815 Upper Water Street  
Halifax, NS B3J 1S7

**Re: CIBC v. 3304051 Nova Scotia Limited – Hfx No. 503367  
Receiver' s Motion for Distribution, Discharge and Other Relief  
June 30, 2021 at 9:30 a.m.**

**This is an urgent filing. We request all Court-stamped copies today for service purposes.**

We represent the moving party, Deloitte Restructuring Inc. (the “Receiver”) in its capacity as court-appointed Receiver of all of the assets of 3304051 Nova Scotia Limited.

Enclosed are the following documents to be filed:

1. five (5) copies of our Notice of Motion;
2. six (6) copies of our supporting brief;
3. five (5) copies of the affidavit of Marc Dunning sworn on June 18, 2021;
4. five (5) copies of the Receiver’s Third Report; and
5. three (3) copies of our draft order.

Also enclosed is our firm cheque in the amount of \$66.00 for the filing fee.

In accordance with the COVID-19: New Process for Scheduling Bankruptcy & Insolvency Matters in the Supreme Court we advise as follows:

1. this is a receivership proceeding where the Receiver was appointed under the *Bankruptcy and Insolvency Act* and *Companies Act*;

2. the requested relief under the Notice of Motion includes abridging the time for service, as necessary, approving the actions of the Receiver, approving the accounts of the Receiver and its legal counsel, authorizing distribution of funds and discharging the Receiver, subject to conditions; and
3. we estimate that this motion can be heard in less than one half hour in General Chambers and that the Chambers Judge will be able to review the enclosed materials in less than one hour.

If you have any questions please do not hesitate to contact me.

Yours very truly,

**WICKWIRE HOLM**



Marc Dunning

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*mdunning@wickwireholm.com*

MD/km

Encl.

c. client  
The Service List