

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

IN THE MATTER OF: The Receivership of Atlantic Oriental Wholesale (AOW) Inc.

BETWEEN:

Business Development Bank of Canada,

Applicant

and

Atlantic Oriental Wholesale (AOW) Inc.

Respondent

Notice of Motion

To: The Service List attached as Schedule "A"

Motion

Deloitte Restructuring Inc., the Court Appointed Receiver and Manager (the "**Receiver**") of the assets, collateral and undertaking ("**Assets**") of the Respondent, Atlantic Oriental Wholesale (AOW) Inc., in this proceeding, moves for, *inter alia*, the following:

1. approving the activities of the Receiver;
2. approving the proposed distribution of funds held by the Receiver, as set out in the Fourth Report of the Receiver dated April 17, 2025;
3. approving the fees and disbursements of the Receiver and its legal counsel, and
4. discharging Deloitte Restructuring Inc. from its duties and as Receiver when it completes the remaining activities set forth in its Fourth Report and filing the Discharge Certificate with this Honourable Court

Time and place

The motion is to be heard by a judge on May 16, 2025, at 9:30 a.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has set the motion for hearing in a half-hour or less in chambers. The moving party says that the motion will not require more time.

References

The moving party relies on the following legislation, Rules or points of law: Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, the *Bankruptcy and Insolvency Act* and *Insolvency General Rules* and *Nova Scotia Civil Procedure Rule* 2.03, 23, 73.11.

Evidence

The evidence in support of the motion is as follows: the Fourth Report of the Receiver.

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 May 8, 2025



Signature
Print Name: Joshua J. Santimaw

Schedule "A"

Atlantic Oriental Wholesale (AOW) Inc.

c/o Matthew J.D. Moir
Weldon McInnis
118 Ochterlony Street
Dartmouth, NS B2Y 1C7
Email: mmoir@weldonmcinnis.ca

Royal Bank of Canada

c/o David Wedlake
Stewart McKelvey
1741 Lower Water St.
Suite 600
Halifax, NS B3J 0J2
Email: dwedlake@stewartmckelvey.com

De Lage Landen Financial Services Canada Inc.

c/o Charles Reagh, Recognised Agent
Stewart McKelvey
1741 Lower Water St.
Suite 600
Halifax, NS B3J 0J2
Email: creagh@stewartmckelvey.com

CWB National Leasing Inc.

c/o Maurice Chiasson, Recognised Agent
Stewart McKelvey
1741 Lower Water St.
Suite 600
Halifax, NS B3J 0J2
Email: mchiasson@stewartmckelvey.com

The Office of the Superintendent of Bankruptcy Canada

c/o Abdulwahid Nasser, Bankruptcy Assistant
Room 1605, Maritime Centre
1505 Barrington Street
Halifax NS B3J 3K5
Email: abdulwahid.nasser@canada.ca

Canada Revenue Agency

c/o Karen Henderson,
Insolvency Collections Officer,
Nova Scotia Tax Services Office
100-145 Hobson's Laker Drive
Halifax, NS B3S QJ1