

Hfx No. 539955
Estate No. 51-3176229
Estate No. 51-3176186
Estate No. 51-3175914
Estate No. 51-3176190
Estate No. 51-3176175

Supreme Court of Nova Scotia
in Bankruptcy and Insolvency

**In the Matter of the Notice of Intention to Make a Proposal under the
Bankruptcy and Insolvency Act, R.S.C. 1985, c. B-3, as amended, of Annapolis
Management, Inc., Ruby, LLP, BSL Holdings Limited, 3337151 Nova Scotia
Limited and 4551650 Nova Scotia Limited**

Notice of Motion

To: The Service List attached at Schedule "A"

Motion

Annapolis Management, Inc., Ruby, LLP, BSL Holdings Limited, 3337151 Nova Scotia Limited and 4551650 Nova Scotia Limited, the applicants in this proceeding moves for, *inter alia*,

- a) an order abridging time pursuant to Rule 6 of the *Bankruptcy and Insolvency Act General Rules*;
- b) an order for confidentiality pursuant to *Nova Scotia Civil Procedure Rule* 85.04 as regards the confidential appendix ("**Confidential Appendix**") to the fifth report ("**Fifth Report**") of Deloitte Restructuring Inc., in its capacity as the Proposal Trustee ("**Deloitte**");
- c) an order pursuant to §65.13 of the BIA approving the sale by the Caryi Group of Companies in these NOI proceedings of the following:
 - (i) real property located at 1665 Granville Street, more particularly described as PID No. 40042087 and 1669 Granville Street, more particularly described as PID No. 00003251, which are both commonly referred to as Granville Hall;
 - (ii) real property located at 1598 Barrington Street, Halifax, Nova Scotia, more particularly described as PID No. 00076455, which is commonly referred to as the Tramway Building; and

- (iii) real property located at 1674 Hollis Street, Halifax, Nova Scotia, more particularly described as PID No. 00003236, which is commonly referred to as the Sonic Building;

on the terms and conditions set out in Deloitte's Fifth Report and its Confidential Appendix, and also providing that:

- (i) the real property shall vest in the purchasers thereof free from any claims, liens, or encumbrances other than permitted encumbrances; and
 - (ii) the monies paid to Deloitte pursuant to the sale of the real property shall stand in the place and stead of it for the purpose of determining the nature of the properties and claims thereto.
- d) an order extending the time for BSL Holdings Limited, 3337151 Nova Scotia Limited and 4551650 Nova Scotia Limited to file a proposal under the *Bankruptcy and Insolvency Act* ("BIA"), commencing from and including July 5, 2025, up to and including July 18, 2025, pursuant to section 50.4(9) of the BIA;
 - e) approving the fees and activities of the Deloitte and its counsel, Stewart McKelvey through May 31, 2025.

Time and place

The motion is to be heard by a judge on July 3, 2025, at 2:00 p.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged one half day 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: BIA and *Nova Scotia Civil Procedure Rules*;

Evidence

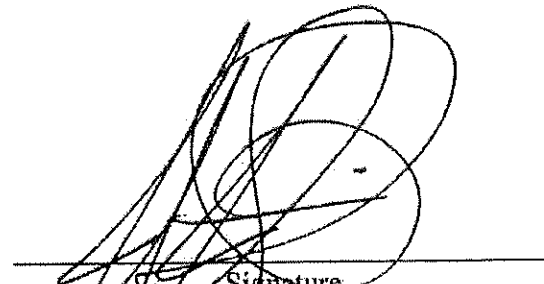
The evidence in support of the motion is as follows: the Fifth Report of Deloitte and its Confidential Supplement.

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 June 26, 2025



Signature

Print Name Joshua J. Santimaw

Schedule A – Service List

<p>MCINNES COOPER 1300-1969 Upper Water Street P.O. Box 730 Halifax, NS B3J 3R7 Attn: Steven Kingston Steven.kingston@mcinnescooper.com</p>	<p>LEAGUE SAVINGS AND MORTGAGE COMPANY 6074 Lady Hammond Rd – Suite 3 Halifax, NS B3K 2R7 Attn: Mark Horne mhorne@aqlsm.ca</p>
<p>O'KEEFE & SULLIVAN 80 Elizabeth Avenue – Suite 202 St. John's, NL A1A 1W7 Attn: Darren O'Keefe Dokeefe@okeefesullivan.com</p>	<p>ASSUMPTION MUTUAL LIFE INSURANCE COMPANY 770 Main Street P.O. Box 160 Moncton, NB B1C 8L1 Attn: Andre Belanger andre.belanger@assumption.ca</p>
<p>GRAYSBROOK CAPITAL LTD. 7105 Chebucto Rd. Suite 350 Halifax, NS B3L 1N3 Attn: Alain Maillet alain@graysbrookcapital.ca</p>	<p>ATLANTIC CENTRAL 6074 Lady Hammond Rd – Suite 3 Halifax, NS B3K 2R7 Attn: Mark Horne mhorne@aqlsm.ca</p>
<p>SALTWIRE NETWORK INC. C/O KSV ADVISORY 220 Bay Street Toronto, ON M5J 2W4 Attn: Bobby Kofman bkofman@ksvadvisory.com</p>	<p>BMO – BANK OF MONTREAL 1675 Grafton Street, Suite 1400 Halifax, NS B3J 0E9 Attn: Martine Langlois martine.langlois@bmo.com</p>
<p>CANADA REVENUE AGENCY Insolvency Division 145 Hobsons Lake Drive Halifax, NS B3S 0H9 Attn: Mike MacLean mike.maclea@cra-arc.gc.ca</p>	<p>DELOITTE RESTRUTURING INC. 1741 Lower Water Street – Suite 800 Halifax, NS B3J 0J2 Attn: James Foran and Todd Ambachtsheer Jforan@deloitte.ca; tambachtsheer@deloitte.ca</p>

	STEWART MCKELVEY 1741 Lower Water Street – Suite 600 Halifax, NS B3J 0J2 Attn: Sara Scott sscott@stewartmckelvey.com
DOURO CAPITAL LIMITED 14 Hampton Court Fall River, NS B2T 1E7 Attn: Tim Gillis tcgillis@yahoo.ca	3046475 NOVA SCOTIA LIMITED 6337 Quinpool Road Halifax, NS B3L 1B7 Attn: Louis J. Thomas louis@sonicentertainmentgroup.com
778938 ONTARIO LIMITED 81A Ronald Avenue Toronto ON M6E 4M9 Attn Ian Sutherland isutherland@stewartmckelvey.com	PARKER PLUMBING AND HEATING LIMITED 50 Thornhill Drive, Unit 7 Dartmouth NS B3B 1R9 frontdesk@parkerplumbing.ca
CIBC 1809 Barrington Street Halifax, NS B3J 1X7 Attn: Stephane Peledreau stephane.peladeau@cibo.com	