

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**

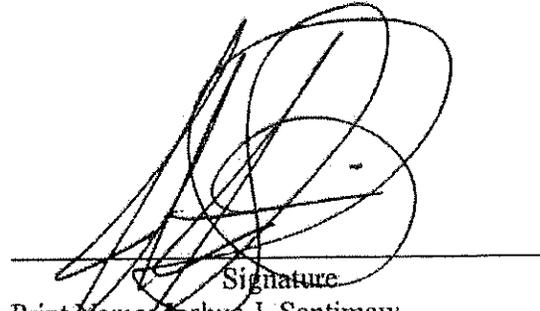
The evidence in support of the motion is as follows: the Fifth Report of Deloitte and its Confidential Supplement.

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

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