

Supreme Court of Nova Scotia
In Bankruptcy and Insolvency

IN THE MATTER OF: The Receivership of Kooshie Cushions of Canada Limited

Between:

Business Development Bank of Canada

Applicant

and

Kooshie Cushions of Canada Limited

Respondent

Notice of Motion

To: Schedule "A" attached

Motion

Deloitte Restructuring Inc., the court-appointed receiver and manager in this proceeding, moves for an Order abridging the time for service of this motion, if necessary, and approving:

- (i) the sale and investment solicitation process;
- (ii) the activities of the Receiver and its legal counsel;
- (iii) the fees and disbursements of the Receiver and its legal counsel;
- (iv) the Receiver's interim statement of receipts and disbursements;
- (v) the increase of borrowing power of the Receiver from \$50,000 to \$500,000; and
- (vi) such further and other actions as the Court deems necessary.

Time and place

The motion is to be heard by Justice John A. Keith on October 2, 2026 at 11:00 a.m. in the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has set the motion for hearing for a half-hour 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:

1. *Bankruptcy and Insolvency Act*, RSC 1985, c. B-3, as amended;
2. *Judicature Act*, RSNS 1989, c. 240;
3. Nova Scotia Civil Procedure Rules; and
4. Such further and other grounds as counsel may advise and this Court may permit.

Evidence

The evidence in support of the motion is as follows: First Report of Deloitte Restructuring Inc., in its capacity as court appointed receiver of Kooshie Cushions of Canada Limited dated September 24, 2026, and filed in this proceeding.

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 September 24, 2026.



Dillon Trider
Counsel for the court-appointed
receiver and manager,
Deloitte Restructuring Inc.

Schedule "A" – Service List

Business Development Bank of Canada c/o Joshua Santimaw BoyneClarke LLP 99 Wyse Road - Suite 600 Dartmouth, NS B3A 4S5 jsantimaw@boyneclarke.ca	Kooshie Cushions of Canada Limited c/o Morris Bureau 6080 Young Street Halifax, NS B3K 5L2 Attn: Richard Bureau richardbureau@morrisbureau.com
Sun Kissed Energy Incorporated 339 Willow Street Truro, NS B2N 5A6 Attn: Mark Shelley mark@sunkissenergy.ca	Nova Scotia Co-Operative Council Limited 435 Willow Street Truro, NS B2N 6T2 Attn: Jeff A. Yuill jeff@novascotia.coop
Brian Ramjattan 496 Topsail Road St. John's, NL A1E 2C2 firstline@nf.aibn.com	Canada Revenue Agency 1256 Barrington Street Halifax, NS B3J 1Y6