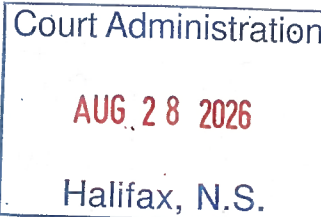


Form 23.03

2026



Hfx No.

556785

**SUPREME COURT OF NOVA SCOTIA
IN BANKRUPTCY AND INSOLVENCY**

Between:

Royal Bank of Canada

Plaintiff

- and -

**Maritime Truss Limited, Douglas Harris, Gregory Sullivan and
Glendon E. MacKenzie**

Defendants

Notice of Motion

To: Service List at Schedule "A"

Motion

Royal Bank of Canada, the Plaintiff in this proceeding, moves for an order seeking:

1. appointing Deloitte Restructuring Inc. as Receiver and Manager over all of the assets, undertakings, and properties of Maritime Truss Limited (the "**Company**") acquired for, or used in relation to the business carried on by the Company, including all proceeds thereof, pursuant to s. 243(1) of the *Bankruptcy and Insolvency Act* and s. 43(9) of the *Judicature Act*;
2. expanding the powers of Deloitte as Receiver to allow the Receiver to assign the Company into bankruptcy; and
3. approving the proposed sales and investment solicitation process.

Time and place

The motion is to be heard by a judge on September 15, 2026 at 2:00 p.m. in the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has set the motion for hearing in a half day 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;
- *Bankruptcy and Insolvency General Rules*, Can. Reg. 368;
- *Judicature Act*, R.S.N.S. 1989, c. 240; and
- the criteria used by this Honourable Court to assess the merits of motions made by secured creditors seeking the Court appointment of Receivers.

Evidence

The evidence in support of the motion is as follows:

1. Affidavit of David Northrup sworn on August 27, 2026 and filed with this motion;
2. Solicitor's Affidavit of Sara Scott sworn on August 27, 2026 and filed with this motion; and
3. Pre-Filing Report of Deloitte Restructuring Inc., to be filed.

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 August 27, 2026



Sara L. Scott / David Wedlake
 Stewart McKelvey
 600-1741 Lower Water Street
 Halifax, NS B3J 0J2
 Telephone: 902.420.3200
 Facsimile: 902.420.1417
Counsel for the Plaintiff,
Royal Bank of Canada

Schedule "A"

SERVICE LIST

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DELOITTE RESTRUCTURING INC. Queen's Marque 800-1741 Lower Water Street Halifax, NS B3J 0J2	James Foran, LIT Email: jforan@deloitte.ca McInnes Cooper McInnes Cooper Tower – Purdy's Wharf 1300 - 1969 Upper Water Street Halifax, NS B3J 3R7 Stephen Kingston Email: stephen.kingston@mcinnescooper.com
MARITIME TRUSS LIMITED	Burchell McDougall LLP 710 Prince Street Truro, NS B2N 5H1 Greg Mullen Email: gmullen@burchellmacdougall.com
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CANADA REVENUE AGENCY Insolvency Intake Centre Shawinigan – Sud National Verification and Collections Centre 4695 Shawinigan-Sud Boulevard Shawinigan, QC G9P 5H9	Fax: 1-833-697-2390
OFFICE OF THE SUPERINTENDENT OF BANKRUPTCY Maritime Centre 1505 Barrington Street, 16 th floor Halifax, NS B3J 2X6	Email: osbservice-bsfservice@ised-isde.gc.ca
CASTLE BUILDING CENTRES GROUP LTD.	Cox & Palmer 1500-1625 Grafton Street Halifax, NS B3J 0E8 Gavin MacDonald, Recognized Agent Email: gmacdonald@coxandpalmer.com
TOYOTA INDUSTRIES COMMERCIAL FINANCE CANADA, INC.	Stewart McKelvey Queen's Marque 600-1741 Lower Water Street Halifax, NS B3J 0J2 Maurice P. Chiasson, KC, Recognized Agent Email: mchiasson@stewartmckelvey.com

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