

Supreme Court of Nova Scotia
In Bankruptcy and Insolvency

IN THE MATTER OF: THE RECEIVERSHIP OF MERIDIEN ATLANTIC FISHING LTD., ROCKY
COAST SEAFOODS LTD. AND 9514228 CANADA INC.

Between:

THE TORONTO-DOMINION BANK

Applicant

and

**MERIDIEN ATLANTIC FISHING LTD.,
ROCKY COAST SEAFOODS LTD. and 9514228 CANADA INC.**

Respondents

Notice of Motion

To: Service List at Schedule "A"

Motion

Deloitte Restructuring Inc. ("**Deloitte**"), as Receiver of all of the assets, undertakings and properties of Meridien Atlantic Fishing Ltd., Rocky Coast Seafoods Ltd. and 9514228 Canada Inc. (the "**Companies**") acquired for, or used in relation to a business carried on by the Companies, moves for an Order:

1. approving the transfer of certain proceeds held in the receivership to the bankruptcy estate of Rocky Coast Seafoods Ltd.;
2. approving the final distribution of proceeds as set out in the Receiver's Seventh Report dated December 4, 2024 (the "**Seventh Report**");
3. approving the activities of Deloitte as Receiver as set out in the Seventh Report;
4. approving and passing the accounts of Deloitte and its counsel; and
5. discharging Deloitte from its duties as Receiver.

Time and place

The motion is to be heard by a judge on Thursday, December 12, 2024 at 9:30 a.m. at the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. 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;
- *Bankruptcy and Insolvency General Rules*, CRC, c. 368, Rule 6 (providing for 4 days' notice of the motion); and
- *Nova Scotia Civil Procedure Rules* 2.03, 23 and 73.11.

Evidence

The evidence in support of the motion is as follows:

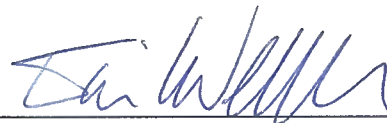
1. Previous reports of Deloitte filed with this Court;
2. Seventh Report of Deloitte dated December 4, 2024, filed with this motion;
3. Affidavit of James Foran sworn November 22, 2024, attached as Appendix "E" to the Seventh Report and filed with this motion; and
4. Solicitor's Affidavit of Sara L. Scott sworn November 22, 2024, attached as Appendix "F" to the Seventh Report and filed with this motion.

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 December 4, 2024



Sara L. Scott
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Counsel for the Receiver,
Deloitte Restructuring Inc.

**Schedule "A"
Service List**

PARTY	CONTACT
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<p>Deloitte Restructuring Inc. Queen's Marque 800-1741 Lower Water Street Halifax, NS B3J 0J2</p> <p>Stewart McKelvey Queen's Marque 600-1741 Lower Water Street, Halifax, NS B3J 0J2</p>	<p>James Foran, LIT iforan@deloitte.ca</p> <p>Sara L. Scott sscott@stewartmckelvey.com</p> <p>David Wedlake dwedlake@stewartmckelvey.com</p>
<p>9514228 Canada Inc. c/o BOYNECLARKE LLP Metropolitan Place, Suite 600 99 Wyse Road Dartmouth, NS B2Y 3Z5</p>	<p>Tracy Smith tsmith@boyneclarke.ca</p>
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<p>Workers' Compensation Board of NS 5668 South Street Halifax NS B3J 2Y2</p>	<p>Brenda Carvery brenda.carvery@wcb.ns.ca</p>
<p>Office of the Superintendent of Bankruptcy Maritime Centre 1505 Barrington Street, 16th floor Halifax, NS B3J 2X6</p>	<p>Kyndra Taylor kyndra.taylor@ised-isde.gc.ca</p> <p>Helen Zebedee helen.zebedee@ised-isde.gc.ca</p>
<p>Canada Revenue Agency Insolvency Division 145 Hobsons Lake Drive Halifax, NS B3J 215</p>	<p>Mike MacLean mike.maclean@cra-arc.gc.ca</p>