

October 3, 2024

Via Courier

Prothonotary
The Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax, Nova Scotia

Dear Prothonotary:

Re: In the Matter of The Receivership of TCAS Holdings Limited, Sustainable Fish Farming (Canada) Limited, Sustainable Blue Inc. and TCAS IP Inc.
Hfx. No. 531915
Estate No. 51-126479

We are writing to you in our capacity as counsel to Deloitte Restructuring Inc., court appointed receiver of the respondent companies (the "Receiver"). Enclosed please find the following materials for a motion filed by the Receiver to increase its borrowing authority pursuant to the order of this Court issued April 4, 2024:

1. One original and one copy of the Notice of Motion;
2. One original and two copies of a supporting Brief;
3. Two copies of the October 3, 2024 Report of the Receiver;
4. Two copies of a draft order; and
5. Our firm cheque.

We kindly request you issue the documents and return extra copies to my attention. We also wish to draw the Prothonotary's attention to this motion being brought pursuant to the *Bankruptcy and Insolvency Act*. Per the Bankruptcy and Insolvency General Rule 3, the *BIA* Rules supersede our Civil Procedure Rules in the event of any inconsistency.

As such, we are filing this matter with four clear days notice per *BIA* Rule 6.

Should you have any questions about the timing, I kindly request you contact my colleague, Meaghan Kells at 902-491-6829.

Gavin D.F. MacDonald | Partner

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Although this is a bankruptcy and insolvency matter, we have set this down in General Chambers pursuant to the direction provided by this Court on February 29, 2024. Specifically:

1. This matter is expected to take less than 30 minutes and there will be no cross examination;
2. The evidence will consist of a short report from the Receiver, and we estimate all materials can be reviewed in one hour or less; and
3. No opposition is expected.

If for any reason this Court directs that this matter does not proceed in General Chambers, we respectfully request direction as to the timing of hearing since there is some urgency given that the Receiver requires additional funding to maintain the operations of the respondent companies.

I thank you for your attention to this matter.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'G.D.F. MacDonald', followed by a long horizontal flourish and a small circular mark at the end.

Gavin D.F. MacDonald
GDFM/GDFM