

June 13, 2024

VIA HAND DELIVERY

Prothonotary
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax, Nova Scotia B3J 1S7

To whom it may concern:

**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**

We are counsel to Deloitte Restructuring Inc. (the “**Receiver**”) court appointed receiver of TCAS Holdings Limited, Sustainable Fish Farming (Canada) Limited, Sustainable Blue Inc. and TCAS IP Inc. (collectively. The “**Companies**”). The Receiver is filing a motion contemporaneously with this Motion by Correspondence.

Receivership Application

The Receiver has filed a Notice of Motion in Chambers scheduled to be heard by Justice Jamieson on June 20, 2024, at 2:00 p.m. (the “**Motion**”). In its Motion, the Receiver is requesting the Court to issue an order of confidentiality.

The materials referenced in support of the Motion include the Supplementary Second Report of the Receiver (the “**Supplemental Report**”). The Supplemental Report includes attachments subject to contractual obligations of confidentiality and sensitive business information.

The Receiver has provided Notice that it will be seeking an Order for Confidentiality as regards the Supplemental Report at the hearing of the filed Motion.

Interim Order for Confidentiality

We attach the following:

1. Supplemental Second Report; and
2. Draft Interim Order for Confidentiality.

Gavin D.F. MacDonald | Partner

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The Receiver submits that this would be an appropriate circumstance for the Court to exercise its discretion to issue an Interim Order for Confidentiality as regards the Supplemental Report pursuant to **Civil Procedure Rules 85.04(4) and (5)** - extending to the conclusion of the filed Motion.

We hope that this is satisfactory but would be pleased to provide any further information which the Court may require at any time.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Gavin D.F. MacDonald', with a large, sweeping flourish extending to the right.

Gavin D.F. MacDonald
GDFM/sp

Enclosures