

2024

Hfx No. 531915

**Supreme Court of Nova Scotia
In Bankruptcy and Insolvency**

IN THE MATTER OF: THE RECEIVERSHIP OF TCAS HOLDINGS LIMITED, SUSTAINABLE FISH FARMING (CANADA) LIMITED, SUSTAINABLE BLUE INC. and TCAS IP INC.

Between:

4595756 Nova Scotia Limited

Applicant

and

**TCAS Holdings Limited, Sustainable Fishing Farming
(Canada) Limited, Sustainable Blue Inc. and TCAS IP Inc.**

Respondents

Notice of Motion

To: The parties listed in Schedule "A" via electronic mail

Motion

Deloitte Restructuring Inc. in its capacity as court appointed receiver and manager of the respondent companies (the "Receiver") moves for a Confidentiality Order pursuant to Civil Procedure Rule 85.04 providing for the protection of confidentiality of the Supplemental Second Report dated June 13, 2024 filed in this proceeding.

Time and place

The motion is to be heard by Justice Darlene Jamieson on June 20, 2024 at 2:00 pm at the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has arranged for one-half day 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. Civil Procedure Rules 85; and
2. Such further and other references as counsel may advise and this Honourable Court may permit,

Evidence

The evidence in support of the motion is as follows:

1. Supplemental Second Report of the Receiver dated June 13, 2024.

Possible order against you

You may file an affidavit and a brief stating your position on whether the proposed order should be made. If you do not make a filing, the Judge may grant an order without further notice to you.

Signature

Signed on June 13, 2024.

A handwritten signature in blue ink, appearing to read 'G. MacDonald', is written over a horizontal line.

Gavin MacDonald as Counsel for Deloitte
Restructuring Inc.

Cox & Palmer

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Respondents

SERVICE LIST

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| <p>4595756 Nova Scotia Limited c/o Stewart McKelvey 600-1741 Lower Water Street Halifax, NS B3J 0J2</p> <p>Maurice P. Chiasson, K.C. 902-420-3300 mchiasson@Stewartmckelvey.com</p> <p>David Wedlake 902-444-1705 dwedlake@stewartmckelvey.com</p> <p>Applicant</p> | <p>TCAS Holdings Limited TCAS IP Inc. 20 MacDonald Ave. Dartmouth, NS B3B 1C5</p> <p>Chris Sangster cds@stevensgroup.ca</p> <p>Sustainable Fish Farming (Canada) Limited Sustainable Blue Inc. 20 MacDonald Ave. Dartmouth, NS B3B 1C5</p> <p>Kirk Havercroft kirkhavercroft@sffc.ca</p> <p>Respondents</p> |
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| <p>Deloitte Restructuring Inc. 1741 Lower Water Street, Suite 800 Halifax, NS B3J 0J2</p> <p>James Foran, CPA, CA, CIRP, LIT 902-721-5661 jforan@deloitte.ca</p> <p>Todd Ambachtsheer, CPA, CA, CIRP, LIT 416-607-0781 tambachtsheer@deloitte.ca</p> <p>Naomi McGregor 403-503-1423 naomcgregor@deloitte.ca</p> <p>Colleen O'Brien 709-758-5215 colobrien@deloitte.ca</p> <p>Receiver and Manager</p> | <p>Cox & Palmer Nova Centre, South Tower 1500-1625 Grafton Street Halifax, NS B3J 3E5</p> <p>Josh McElman, K.C. 506-633-2708 jmcelman@coxandpalmer.com</p> <p>Gavin MacDonald 902-491-4464 gmacdonald@coxandpalmer.com</p> <p>Counsel to Receiver and Manager</p> |
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| <p>Linde Canada Inc. 80 Westcreek Blvd Brampton, ON L6T 0B8</p> <p>Brian Ramnarine 833-796-3800, ext. 4517 brian.ramnarine@linde.com</p> | <p>Atlantic Fisheries Fund PO Box 1006 1 Challenger Drive Dartmouth, NS B2Y 4A2</p> <p>Stacey Frame 902-401-8255 stacey.frame@dfo-mpo.gc.ca</p> |

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