

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 Fish 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:

1. An order removing 4595756 Nova Scotia Limited as Applicant and substituting 4644903 Nova Scotia Limited as Applicant.

Time and place

The motion is to be heard by the Honourable Justice Presiding in General Chambers on March 14, 2025 at 9:30 am at the Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has scheduled this matter for a half hour or less in General 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. *Bankruptcy and Insolvency Act* s. 243;
2. *Bankruptcy and Insolvency Act General Rules* (Can. Reg. 368) sections 3, 4, and 6;
3. *Civil Procedure Rule* 83.04; and
4. Such further or other references as counsel may advise and this Honourable Court may permit.

Evidence

The evidence in support of the motion is as follows:

1. Fifth Report of the Receiver dated March 5, 2025, and filed with these materials.

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 on March 5, 2025.

Reaghan Kells
Clerk of the Supreme
Court of Nova Scotia

for 

Gavin MacDonald as Counsel for Deloitte
Restructuring Inc.
Cox & Palmer
Nova Centre – South Tower
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Halifax, NS B3J 0E8
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Schedule "A"

Service List

2024

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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 Fish Farming (Canada) Limited, Sustainable Blue
Inc. and TCAS IP Inc.

Respondents

SERVICE LIST

4595756 Nova Scotia Limited c/o Stewart McKelvey 600-1741 Lower Water Street Halifax, NS B3J 0J2 Maurice P. Chiasson, K.C. 902-420-3300 mchiasson@Stewartmckelvey.com David Wedlake 902-444-1705 dwedlake@stewartmckelvey.com Applicant	TCAS Holdings Limited TCAS IP Inc. 20 MacDonald Ave. Dartmouth, NS B3B 1C5 Chris Sangster cds@stevensgroup.ca Sustainable Fish Farming (Canada) Limited Sustainable Blue Inc. 20 MacDonald Ave. Dartmouth, NS B3B 1C5 Kirk Havercroft kirkhavercroft@sffc.ca Respondents
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4644903 Nova Scotia Limited c/o Stewart McKelvey 600-1741 Lower Water Street Halifax, NS B3J 0J2 Maurice P. Chiasson, K.C. 902-420-3300 mchiasson@Stewartmckelvey.com David Wedlake 902-444-1705 dwedlake@stewartmckelvey.com Proposed Applicant	
Deloitte Restructuring Inc. 1741 Lower Water Street, Suite 800 Halifax, NS B3J 0J2 James Foran, CPA, CA, CIRP, LIT 902-721-5661 jforan@deloitte.ca Todd Ambachtsheer, CPA, CA, CIRP, LIT 416-607-0781 tambachtsheer@deloitte.ca Naomi McGregor 403-503-1423 naomcmgregor@deloitte.ca Colleen O'Brien 709-758-5215 colobrien@deloitte.ca Receiver and Manager	Cox & Palmer Nova Centre, South Tower 1500-1625 Grafton Street Halifax, NS B3J 3E5 Josh McElman, K.C. 506-633-2708 jmcelman@coxandpalmer.com Gavin MacDonald 902-491-4464 gmacdonald@coxandpalmer.com Counsel to Receiver and Manager

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Atlantic Canada Opportunities Agency ACOA Legal Services 644 Main Street P.O. Box 6051 Moncton, NB E1C 9J8 Karine Le Breton 506-875-9355 karine.lebreton@justice.gc.ca	Nijhawan McMillan & Conlon Barristers 5162 Duke Street, Suite 200 Halifax, NS B3J 1N7 Nasha Nikhawan 902-407-3871 nasha@nmbarristers.com Sheree Conlon, KC 902-407-2405 sheree@nmbarristers.com Counsel for Jeremy Lee

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