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CANADA PROVINCE OF QUÉBEC DISTRICT OF MONTREAL

SUPERIOR COURT (Commercial Division)

No.: 500-11-049142-157 Estate No: 41-2016258

IN THE MATTER OF THE INTENTION TO MAKE A PROPOSAL OF:

INDUSTRIES COVER INC.

de créanciers Tenne

DELOITTE RESTRUCTURING INC.

le 9 mars 2016

Trustee

Debtor/Petitioner

Mr ce 7 avril 2016

MOTION

DEMAND FOR THE APPROVAL OF A PROPOSAL (Section 58 of the Bankruptcy and Insolvency Act)

-and-

TO ONE OF THE REGISTRARS OR TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN COMMERCIAL DIVISION, IN AND FOR THE DISTRICT OF MONTREAL, THE PETITIONER SUBMITS AS FOLLOWS:

A. INTRODUCTION

- 1. For the reasons set forth hereinafter, the Petitioner, Industries Cover Inc. ("Cover" or the "Petitioner") hereby seeks the approval by this Court of a proposal filed on January 15, 2016 pursuant to the *Bankruptcy and Insolvency Act* (the "Proposal").
- 2. All capitalized terms that are not otherwise defined in the present Demand have the meaning given to them in the Proposal.

B. BACKGROUND

- 3. Cover is a corporation initially incorporated under Part 1A of the *Quebec Companies Act*, CQLR, c. C-38, and continued under the *Quebec Business Corporations Act*, CQLR, c. S-31.1.
- 4. Since its constitution in 1990, the Petitioner has specialized in the manufacturing of glass products, mainly (but not exclusively) insulated glass units, which are sold to manufacturers of windows (industrial, commercial and residential).

Gouvernement du Gluébec Palais Justice MININEA

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MBeaudoin