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Via Facsimile & Hand Delivery (902-424-0524)

The Honourable Justice John Bodurtha
Supreme Court of Nova Scotia
The Law Courts
1815 Upper Water Street
Halifax, NS B3J 1S7

My Lord:

**Re: In the Matter of the Proposal of Atlantic Crane & Material Handling Limited,
Labrador Cranes 2005 Limited and LCB Rentals Limited – Hfx No. 507069
Motion Hearing – August 19, 2021 at 9:30 a.m.**

We are counsel for BDC Capital Inc. ("**BDC Capital**"), a creditor of Atlantic Crane & Material Handling Limited, Labrador Cranes 2005 Limited and LCB Rentals Limited (the "**Companies**"). We write in response to the submissions filed by the Companies on September 22, 2021.

We write this letter to the Court to indicate that we will not be taking any position on the relief being sought by the Applicants at the hearing tomorrow before Your Lordship.

Yours respectfully,

Sara L. Scott

SLS/lms

c. Client
Service List