

File Reference: SM001411-306

June 25, 2021

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**Via Facsimile (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  
Application Hearing – July 29, 2021 at 2:00 p.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 "**Debtors**"), who have filed a Notice of Intention to Make a Proposal under the *Bankruptcy and Insolvency Act* (the "**BIA**").

The application on behalf of the Debtors seeks multiple grounds of relief, including:

1. a request for an extension of time to file a proposal; and
2. the approval of the sale of the property located at 280 Groundview Avenue, Saint John, New Brunswick (the "**Property**").

**Request for an Extension of Time to File a Proposal**

BDC Capital takes no position on the request for an extension of time to file a proposal.

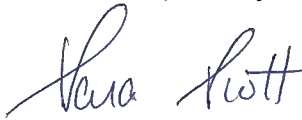
**Sale of the Property**

BDC Capital takes no position on the proposed sale of the Property; however, it does object to any request that the remaining proceeds (the "**Proceeds**") be distributed after the BDC mortgage and other associated expenses tied to the sale the Property are paid.

The Debtors have different creditors and different obligations and there are a variety of issues to be resolved with respect to how the Proceeds may be distributed. Given the position of the Bank of Montreal ("**BMO**") that it is entitled to receive the Proceeds from the sale of the Property, BDC Capital suggests more information is needed from the proposal trustee in relation to any proposed distribution, so that the parties may fully understand any priority to the Proceeds.

Any distribution of the Proceeds at this initial hearing seems premature, given that it is expected that multiple creditors may take the position that they are entitled to the Proceeds.

Yours respectfully,

A handwritten signature in blue ink that reads "Sara Scott". The signature is written in a cursive, flowing style.

Sara L. Scott

SLS/lms

c. Client  
Service List