

2021

Hfx. No. 507069
Estate No. 51-2743163
Court No. 44783
District of Nova Scotia
Division No. 01-Halifax

**SUPREME COURT OF NOVA SCOTIA
IN BANKRUPTCY & INSOLVENCY**

**IN THE MATTER OF THE PROPOSAL OF
ATLANTIC CRANE & MATERIAL HANDLING LIMITED, LABRADOR
CRANES 2005 LIMITED and LCB RENTALS LIMITED**

Notice of Motion

To: The Service List attached hereto

Motion

Atlantic Crane & Material Handling Limited, Labrador Cranes 2005 Limited, and LCB Rentals Limited, the Applicants in this proceeding, move for orders:

1. insofar as necessary, abridging the notice periods pursuant to *Civil Procedure Rule 2.03* and the *Bankruptcy and Insolvency General Rules*, Rule 3;
2. pursuant to 50.4(9) of the *Bankruptcy and Insolvency Act* (“*BIA*”), directing that service on the service list set out in Schedule “A” hereto is sufficient for the purposes of these motions;
3. pursuant to Section 50.4(9) of the *BIA* extending the time to file a Proposal in this proceeding, such extension to be from October 1, 2021 up to and including November 15, 2021; and
4. pursuant to Section 65.13 of the *BIA* approving the sale of the assets of the Applicants;

Time and place

The motion is to be heard by a judge on September 29, 2021, at 3 p.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged this time 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: *Civil Procedure Rule 2.03, Bankruptcy and Insolvency General Rules*, Rule 3, BIA sections 50.4(9) and 65.13.

Evidence

The evidence in support of the motion is as follows: Third Report of MNP Limited, Proposal Trustee.

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 September 21, 2021.



Tim Hill, Q.C.

BOYNECLARKE LLP

Barristers and Solicitors

99 Wyse Road, Suite 700

Dartmouth, Nova Scotia B3A 4S5

Telephone: (902) 460-3442

Fax: (902) 463-7500

Counsel for Atlantic Crane & Material
Handling Limited, Labrador Cranes 2005
Limited and LCB Rentals Limited

SERVICE LIST

MNP Limited

Attention: J. Eric Findlay, CIRP, LIT, CPA
Senior Vice President
1801 Hollis Street
Suite 1400
Halifax, NS B3J 3N4

eric.findlay@mnp.ca

BDC Capital Inc.

c/o Sara L. Scott, counsel
Stewart McKelvey
1741 Lower Water St Suite 600,
Halifax, NS B3J 0J2

sscott@stewartmckelvey.com

Toronto Dominion Bank

c/o D. Bruce Clarke, Q.C., counsel
Burchells LLP
1801 Hollis St., Suite 1800
Halifax, B3J 3N4

bclarke@burchells.ca

Bank of Montreal

c/o Ben R. Durnford, counsel
McInnes Cooper
1969 Upper Water St Suite 1300,
Halifax, NS B3J 2V1

ben.durnford@mcinnescooper.com

Hercules SLR Inc.

c/o Christene H Hirschfeld
BoyneClarke LLP
Barristers and Solicitors
99 Wyse Road, Suite 700
Dartmouth, Nova Scotia B3A 4S5

CHirschfeld@boyneclarke.ca

Russell Industries Corp

c/o Marc Dunning

Wickwire Holm

1801 Hollis Street Suite 300

PO Box 1054

Halifax, NS B3J 2X6