

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 August 19, 2021 up to and including October 1, 2021;
4. pursuant to Section 65.13 of the *BIA* approving the sale of the assets of the Applicants in the manner described in the Stalking Horse and Bidding Procedures Order filed herewith;
5. pursuant to *Civil Procedure Rule 85.05* providing that access to Appendix “A” to the Second Report of the Proposal Trustee (the “Confidential Supplement”) be restricted to the Chambers Justice (or other such persons as may be designated by the Chambers Justice) for a period of three (3) months from the date of the Order.

## **Time and place**

The motion is to be heard by a judge on August 19, 2021, at 9:30 a.m. in The Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia, B3J 1S7. The moving party has arranged one day 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**

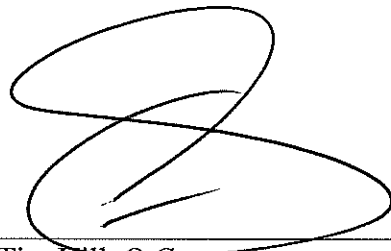
The evidence in support of the motion is as follows: Affidavit of Jack Miner filed herewith, and the Second Report of MNP Limited, Proposal Trustee.

## **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 August 6, 2021.



Tim Hill, Q.C.

**BOYNECLARKE LLP**

Barristers and Solicitors

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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  
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### **BDC Capital Inc.**

c/o Sara L. Scott, counsel  
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### **Toronto Dominion Bank**

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### **Bank of Montreal**

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