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**FILE REFERENCE:**

153597

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October 8, 2021

Halifax Regional  
Municipality

**99 Wyse Road, Suite 600**  
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NS Canada **B3A 4S5**

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

My Lord:

Correspondence:  
P.O. Box 876  
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**Re: Hfx. No. 507069: Atlantic Crane & Material Handling Limited, Labrador  
Cranes 2005 Limited, and LCB Rentals Limited (the "Insolvents")**

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In my letter of October 7, I advised the court of a material adverse change in the circumstances of the Insolvents arising after the Court's order of September 29<sup>th</sup>. Details were set out in the MNP Limited (the "Trustee") report filed yesterday.



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We advised that it was the Insolvent and Trustee's view that, because of the significant decrease in anticipated recovery, the Court's direction was required. Your Lordship has been kind enough to set this down to be heard on Tuesday October 12, at 2 p.m.

Attached with this correspondence is a revised notice of motion.

I have read Ms. Hirschfeld's correspondence to the Court of today's date. The competition here is between her client and that of Mr. Dunning. My client, Atlantic Crane, takes no position with respect to that competition. Suffice it to say that a decision is required as the Applicants are running out of funds to continue operating.

We look forward to appearing before you on Tuesday next.

Yours respectfully.

**BOYNECLARKE LLP**



Tim Hill, Q.C.  
cc. The Service List