
O'KEEFE & SULLIVAN

APPLICATION FOR URGENT RELIEF

BY EMAIL AND COURIER

The Supreme Court of Newfoundland and Labrador
223 Duckworth Street,
St. John's, NL
Attn: Registry

And to the Electronic Service List.

03 February 2025

To the Registry:

Re: Nemori Farms Ltd. ("NFL")

Enclosed herewith you will find the following:

1. Application for an initial order pursuant to s.11 of the *Companies Creditors Arrangement Act*, RSC, 1985;
2. Draft Initial Order;
3. Original Affidavit of Darren D. O'Keefe; and
4. Copy of Affidavit of Sheldon Cameron, with original to follow.

Please note that an urgent hearing date is requested for first day relief. NFL operates a 300-herd dairy farm in Western Newfoundland and is currently in a cash crisis which needs to be resolved on an interim basis in order to purchase feed and other supplies to ensure the health and well-being of the animals.

It is anticipated that prior to the initial hearing date the Applicant will file an amended application seeking interim financing to allow it to buy feed and other essentials for the farm.

Regards,

O'KEEFE & SULLIVAN



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