

SUPREME COURT OF NOVA SCOTIA

IN THE MATTER OF THE *COMPANIES' CREDITORS*
ARRANGEMENT ACT, R.S.C. 1985, c. C-36, AS AMENDED

AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF CRESO
CANADA LIMITED

Notice of Motion

To: Service List attached at Schedule "A"

Motion

Grant Thornton Limited, the Court-appointed Monitor in this proceeding, moves for an order:

1. abridging the timelines for filing and service under the Nova Scotia *Civil Procedure Rules*;
2. approving the distribution of funds as set out in the Fourth Report dated September 16, 2025 (the "**Fourth Report**");
3. extending the stay of proceedings to the earlier of either: (i) Creso Canada Limited's assignment into bankruptcy, pursuant to the Monitor's amended powers, or (ii) the termination of the CCAA proceeding upon the filing of the Monitor's Termination Certificate;
4. terminating the DIP Charge, Director and Officer's Charge, and KERP Charge;
5. terminating the CCAA Proceedings and discharging the Monitor from its duties upon filing of the Monitor's Termination Certificate;
6. terminating the Administration Charge upon filing of the Monitor's Termination Certificate;
7. approving the activities of the Monitor as set out in the Fourth Report;
8. approving the fees and disbursements of the Monitor and those of its counsel; and
9. such further and other relief as this Honourable Court may deem just.

Time and place

The motion is to be heard by a judge on Tuesday, September 23, 2025 at 9:30 a.m. in the Halifax Law Courts, 1815 Upper Water Street, Halifax, Nova Scotia. The moving party has set the motion for a half day or less 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:

1. *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended; and
2. *Nova Scotia Civil Procedure Rules*, Rules 1.01, 2.03.

Evidence

The evidence in support of the motion is as follows:

- Fourth Report of the Monitor dated September 16, 2025, filed with this motion.

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 16, 2025



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SCHEDULE "A" – SERVICE LIST

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